

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

Fiscal Year (FY) 2020–2021 Proposed Power and Transmission Rate Adjustments Public Hearing and Opportunities for Public Review and Comment	Docket No. BP-20
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**Petition to Intervene of NorthWestern Corporation**

The Bonneville Power Administration is holding this proceeding to establish power and transmission rates for Fiscal Year 2020–2021. Pursuant to Section 1010.6 of Bonneville’s Rules of Procedure and the Notice of FY 2020–2021 Proposed Power and Transmission Rate Adjustments,<sup>1</sup> NorthWestern Corporation d/b/a NorthWestern Energy hereby files this Petition to Intervene as a party in this proceeding.

**I. Description of NorthWestern Energy**

NorthWestern is a public utility engaged in the generation, transmission, and distribution of electricity and the supply and transportation of natural gas. Its facilities are located primarily in Montana and South Dakota. In Montana, NorthWestern is a transmission owner/operator and Balancing Authority Area operator within the Western Electricity Coordinating Council. In South Dakota, NorthWestern is a transmission owner

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<sup>1</sup> 83 FED. REG. 62849 (2018).

within the Southwest Power Pool, Inc. and has transferred functional control of a large portion of its electric transmission facilities to SPP.

## **II. Petition to Intervene**

The Montana Intertie is a 500-kV transmission line located in NorthWestern's Balancing Authority Area that runs from the Broadview Substation in the east to the Garrison Substation in the west. The Montana Intertie is divided physically and contractually into two sections, with Townsend, Montana, as the dividing point. NorthWestern operates the section from the Broadview Substation to Townsend. Bonneville owns and operates the section from Townsend to the Garrison Substation. This section is also referred to as the Eastern Intertie.

NorthWestern is a party to the Montana Intertie Agreement.<sup>2</sup> Bonneville's existing rates provide a mechanism for the parties to the Montana Intertie Agreement to receive credit for transmission use of the Montana Intertie in exchange for covering the entire revenue requirement for this segment of Bonneville's transmission system. Three of Bonneville's rates apply to this intertie: (1) the Montana Intertie Rate (IM-20) applies to customers taking point-to-point service on the Eastern Intertie that are not parties to the Montana Intertie Agreement; (2) the Townsend–Garrison Transmission Rate (TGT-20) is a rate for firm service over Bonneville's section of the Montana Intertie and is available

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<sup>2</sup> The Montana Intertie Agreement is on file with the Federal Energy Regulatory Commission as NorthWestern Energy Rate Schedule FERC No. 185.

to the parties to the Montana Intertie Agreement; and (3) the Eastern Intertie Rate (IE-20) is a rate for non-firm service on the portion of the Eastern Intertie capacity that exceeds Bonneville's firm transmission rights and is available to parties to the Montana Intertie Agreement.

NorthWestern uses its transmission demand under the Montana Intertie Agreement to move its energy from Eastern Montana to its loads in Western Montana. Therefore, NorthWestern has a direct and relevant interest in any rate changes that affect the Montana Intertie. Other participants in this proceeding may take positions on the issues that support their specific interests, and those positions may differ from the positions NorthWestern may take. Thus, no other party can adequately represent NorthWestern's interests in this proceeding.

### **III. Communications**

NorthWestern requests that all communications and materials with respect to this proceeding be served on the following:

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Director – Regional Transmission  
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#### IV. Conclusion

WHEREFORE, NorthWestern respectfully requests the hearing officer accept this intervention and permit NorthWestern to participate as a party in this proceeding.

Respectfully submitted this 11<sup>th</sup> day of December, 2018.

**NorthWestern Corporation d/b/a  
NorthWestern Energy**

/s/ M. Andrew McLain

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