



NorthWestern, like other electric utilities, makes plans for the supply of electricity years in advance. This long-term planning is also required by law. In Montana, NorthWestern prepares formal, written plans that are filed with the MPSC. Attached as Exhibits B-1 and B-2 to these comments is a copy of Volume 1 of NorthWestern's 2019 Electricity Resource Procurement Plan ("ERPP"), which was filed at the MPSC in Docket No. N2018.11.78.¹ Attached as Exhibit C is the 2020 Supplement to the 2019 Plan. Attached as Exhibits D and E are the two volumes of NorthWestern's May 2023 Integrated Resource Plan ("2023 IRP").

NorthWestern began to serve customers in Montana when it purchased the transmission and distribution assets of the Montana Power Company in 2002. Initially, NorthWestern did not own any generation assets to serve Montana customers. This situation was not ideal as it required NorthWestern to purchase all the electricity needed to serve customers. These purchases were and continue to be from a market that experiences volatile pricing and increasing supply shortages.

Since then, NorthWestern has acquired various types of electricity supply resources. Most notably, in 2014 NorthWestern purchased a portfolio of hydroelectric facilities in Montana. NorthWestern has also made significant investments in wind power. NorthWestern currently owns approximately 1,271 megawatts ("MW") of generation capacity and has long-term contracts for another 680 MWs.

NorthWestern's generation portfolio now is a diverse mix of resources, the majority of which are renewable. The portfolio includes 497-MW of hydroelectric maximum delivered capacity, 455-MW of maximum delivered wind capacity, 222-MW of coal capacity, 202-MW of natural gas capacity, 87-MW of waste coal capacity, and 187-MW of solar capacity. The Company also has market capacity contracts for 460 MWs which have price or market exposure. In summary, NorthWestern's current portfolio has 202 MW of natural gas capacity, 309 MW of coal and waste coal based capacity, and 1,129 MW of renewable fueled generation.

The table below lists NorthWestern's existing owned generation facilities and contracted generation resources along with some additional resources that the Company expects to bring online, including the Yellowstone County Generating Station, which is currently under construction.

¹ Volume 2, which includes underlying hourly data among other material, is so voluminous that NorthWestern usually only provides it in electronic form. Given the size of Volume 2 and the number of additional files that would require submission, it is not provided with these comments. NorthWestern will certainly provide it if desired or needed for EPA's evaluation.