

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Complaint by
Oak Tree Energy LLC against NorthWestern
Energy for refusing to enter into a Purchase
Power Agreement

EL 11-006

Affidavit of Steven E. Lewis

STATE OF WASHINGTON)

: ss

COUNTY OF KING)

Steven E. Lewis, being first duly sworn upon oath, states and alleges as follows:

1) I am a principal and employee of Lands Energy Consulting. I have been retained by NorthWestern Energy to provide expert testimony in this docket. I submit this affidavit in support of NorthWestern Energy's Resistance to Oak Tree Energy, LLC's Second Motion to Compel.

2) My *curriculum vitae*, which was filed as Exhibit SEL-01 to the Prefiled Direct and Rebuttal Testimony of Steven E. Lewis in this docket, sets forth my experience and qualifications. It also provides a partial list of clients and a summary of key projects.

3) Oak Tree has asked for the names of clients for which I have used the method of price forecasting advocated in this docket, reports or documentation provided to those clients identifying the method and results of this wholesale electricity price forecast, and prior testimony regarding this methodology.

4) Lands Energy Consulting protects the confidential business information of its clients. Based on a review of its records, Lands Energy has supported 7 different utilities or utility organizations, 1 Native American tribe, 2 industrial end users, 2 resource developers, and 2 consulting firms with forecast electricity prices using this methodology. To identify these clients specifically would violate my confidentiality obligations to those clients.

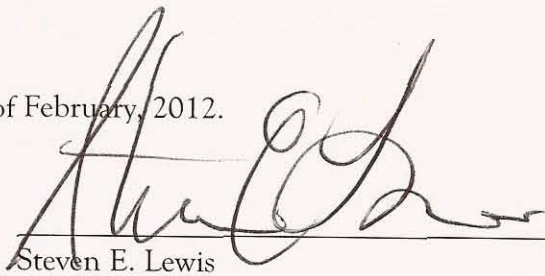
5) Lands Energy Consulting signs non-disclosure agreements with its clients. Producing copies of reports prepared for other clients would violate the terms of those non-disclosure agreements.

6) I have not provided copies of the reports I prepared for other clients to NorthWestern Energy. NorthWestern Energy does not have these reports in its possession or control.

7) I have not provided testimony in any other forum regarding this price forecast methodology.

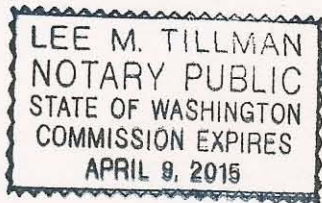
Further affiant sayeth naught.


Dated at Seattle, Washington, this 13 day of February, 2012.



Steven E. Lewis

SIGNED AND SWORN to before me this 13th day of February, 2012, by Steven E. Lewis.





Notary Public, Washington
My appointment expires: 4/9/2015