

Exhibit 19

No. 8

6-4) Refer to NorthWestern's response to Staff Data Request 4-20. In calculating the avoided energy cost, instead of applying the average monthly prices externally after summing up the hourly data for a net purchase or sell position, why doesn't the Company use the hourly prices to calculate the avoided cost?

Response: NorthWestern does not currently have the capability to complete the avoided cost calculation on an hourly level. The Ascend PowerSimm model provides an hourly economic dispatch for all 8760 hours for each year for all of the 100 simulations. Although the model calculates the production costs, it does not finalize the avoided cost calculation for Short, Long1, and Long 2. The calculations are completed as described in Luke Hansen's prefiled testimony. NorthWestern is working on modifications to the PowerSimm model to produce the final energy avoided cost, but those modifications have not been completed.