

Exhibit 19

No. 9

1-15) Please refer to Page BJL-12, lines 11 through 15 of the direct testimony of Mr. LaFave. Please explain how the EIA escalation rate represents a fundamental forecast, and is more reliable than the Ventyx Reference Case.

Response No. 1-15) As described in the Preface of the 2016 EIA report:

The Annual Energy Outlook 2016 (AEO2016), prepared by the U.S. Energy Information Administration (EIA), presents long-term projections of energy supply, demand, and prices through 2040. The Projections, focused on U.S. energy markets, are based on results from EIA's National Energy Modeling System (NEMS). NEMS enables EIA to make projections under alternative, internally consistent sets of assumptions.

The EIA forecast considers state and federal legislations, regulations, and market trends. It is a consistent, unbiased, publically available indication of the change in future market prices.

The Ventyx Reference Case is the output of a for hire proprietary model that may or may not provide an accurate forecast. As of the date of these responses, Juhl has not provided the details of the Ventyx Reference Case to allow NorthWestern to examine its inputs or assumptions. Furthermore, Mr. Roger Schiffman testifies that his firm re-created the Ventyx Reference Case using Promod. Juhl has not provided any information by which NorthWestern could review the accuracy of this statement. Without the ability to see and understand the basis, assumptions and the utilization of the assumptions within the model it would be impossible to determine if the Ventyx Reference Case forecast is appropriate for use to determine the avoided cost for QF projects, to determine if Mr. Roger Schiffman's re-creation of the Reference Case accurately reflects NorthWestern's portfolio, or to ensure that NorthWestern's customers truly are indifferent.

Utilizing the annually published EIA reports as basis for long term escalation provided a consistent, public, and unbiased forecast.