



October 2, 2018

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E.  
Washington, DC 20426

via eFiling

Re: *NorthWestern Corporation*, Docket No. ER19-\_\_\_-000

ER19-33-000

Re-filing of Existing Tariff Records to New Tariff ID

**New Baseline | Other Rate Schedules, Tariff ID 42 | South Dakota Rate Schedules**

Type of Filing Code: 390

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act<sup>1</sup> and Part 35 of the Federal Energy Regulatory Commission's regulations,<sup>2</sup> NorthWestern Corporation d/b/a NorthWestern Energy hereby submits for filing and acceptance an administrative filing to migrate certain tariff records currently filed under Tariff ID 28, NorthWestern Corporation – Electric Utility, to new Tariff ID 42, Other Rate Schedules. This migration filing does not substantively alter NorthWestern's tariffs, service agreements, or rate schedules. As discussed in more detail below, this filing is the last of several filings to migrate NorthWestern's tariff records to a new tariff structure.<sup>3</sup>

In order to provide certainty that this migration results in a clear succession of existing tariff records to new Tariff Records in the FERC eTariff system, NorthWestern respectfully requests waiver of the prior notice requirement and an October 8, 2018 effective date for this filing.

## I. Background

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### A. Description of NorthWestern

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

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18 C.F.R. Part 35 (2018).

<sup>3</sup> Migration filings have been submitted in Docket Nos. ER18-2511-000 (Market Based Rate Tariff), ER18-2519-000 (Reserve Energy Service), ER19-12-000 (South Dakota OATT), and ER19-29-000 (Montana OATT).



Montana and South Dakota. In South Dakota, NorthWestern is a transmission owner within the Southwest Power Pool, Inc. and has transferred functional control of a large portion of its electric transmission facilities there to SPP. In Montana, NorthWestern is a transmission owner/operator and Balancing Authority Area operator within the Western Electricity Coordinating Council.

NorthWestern's Montana and South Dakota transmission facilities are not physically connected and are not in the same electric reliability region. Accordingly, NorthWestern maintains separate open access transmission tariffs (OATT) for operations in each state. In addition, NorthWestern is authorized to sell wholesale power at market-based rates.

## **B. NorthWestern's Baseline Electronic Tariff Filings**

On September 29, 2010, NorthWestern submitted a filing to establish its baseline electronic tariff, in compliance with Order No. 714.<sup>4</sup> NorthWestern's submission included its South Dakota OATT (Record ID 1), its Montana OATT (Record ID 63), and its market-based rate (MBR) tariff (Record ID 128).<sup>5</sup> On December 1, 2011, NorthWestern submitted for filing a baseline of its then-effective Reserve Energy Service Tariff (Record ID 230).<sup>6</sup> These tariffs were all filed under Tariff ID 28, NorthWestern Corporation – Electric Utility. In addition, NorthWestern has filed individually negotiated rate schedules and agreements under Tariff ID 28.

## **II. Description of Migration Filings**

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### **A. Basis for New Tariff IDs**

Since establishing its baseline electronic tariff in 2010, NorthWestern has made hundreds of eTariff filings. Most of the individually negotiated agreements have been filed under the Montana OATT (Record ID 63), resulting in numerous child and grandchild tariff records being inserted between the Montana OATT and the MBR Tariff (Record ID 128). The eTariff software used by NorthWestern automatically assigns Record IDs and Collation Values to each tariff record. Over time, because of the high number of records being inserted, the software's algorithm began assigning the same Collation Value to different tariff records.

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<sup>4</sup> *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008).

<sup>5</sup> *NorthWestern Corp.*, ER10-3171-000 (Nov. 23, 2010) (delegated letter order) (accepting baseline OATTs, effective September 29, 2010). The baseline MBR Tariff was overcome by events (OBE) by revisions filed in, and accepted by the Commission, Docket No. ER11-1858-000.

<sup>6</sup> *NorthWestern Corp.*, ER12-504-000 (Jan. 18, 2012) (delegated letter order) (accepting baseline Reserve Energy Service Tariff, effective December 1, 2011).



NorthWestern discovered this issue after being asked by FERC staff to resubmit tariff records that were part of a filing but did not appear on eTariff.<sup>7</sup> While working to resolve that issue, NorthWestern discovered several instances where the Collation Value had been duplicated. This has resulted in many lost child and grandchild tariff records on eTariff. After working with the eTariff vendor, NorthWestern determined that the best course of action would be to file a new baseline tariff.

## **B. New Electronic Tariff Structure**

NorthWestern’s current electronic tariff structure with all tariff records under one Tariff ID has been difficult to manage. The number of records combined with inconsistent naming practices in the early years of eTariff filings make it difficult to navigate. This is contrary to the Commission’s goal of providing easy access to a company’s tariffs. In addition, having two OATTs filed under one Tariff ID creates unnecessary confusion. Therefore, NorthWestern proposes the following new electronic tariff structure:

<b>Tariff ID</b>	<b>Name</b>
37	Market Based Rate Tariff
38	Reserve Energy Service
39	South Dakota OATT
41	Montana OATT
42	Other Rate Schedules

This organized structure will be easier for the Commission, its staff, and the public to navigate, and easier for NorthWestern to maintain.

## **C. No Changes to Tariff Language**

This migration filing does not include changes to any tariff, service agreement, or rate schedule on file with the Commission. NorthWestern is reorganizing its existing tariff records under Tariff ID 28 into five discrete Tariff IDs. This will change the metadata, but it will not alter the content of NorthWestern’s tariffs.<sup>8</sup> NorthWestern is not proposing any changes to its tariff language in this migration filing. All tariff language will be migrated to the new Tariff IDs exactly as it appears in the existing Tariff ID. In addition, this migration filing will not have any impact on customer rights — substantive or procedural.

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<sup>7</sup> See Amendment of Pending Tariff Filing submitted in Docket No. ER17-2146-001.

<sup>8</sup> For its rate schedules and service agreements, NorthWestern has updated the Tariff Record Title field as necessary to follow NorthWestern’s current naming of convention of “SA [or RS] XXX – [Type of Agreement] with [Counterparty Name.]”



## D. Migration Filings

To facilitate the migration to the new tariff structure, NorthWestern will submit several filings to establish the new Tariff IDs and migrate the currently effective tariff records. NorthWestern will submit separate filings for each new Tariff ID as follows:

- NorthWestern submit a filing with Type of Filing Code 390 to establish each new Tariff ID. Each Type-390 filing will be submitted under Program Code E – FPA Electric (Traditional Cost of Service and Market Based Rates) Public Utility for the Organization NorthWestern Corporation (Federal Power Act).
- After all the effective tariff data has been filed under a new Tariff ID, NorthWestern will cancel the corresponding Records IDs under Tariff ID 28 using Type of Filing Code 260.<sup>9</sup>
- Finally, NorthWestern will cancel Tariff ID 28 using Type of Filing Code 410.

This process is consistent with the accepted procedures for managing and changing tariff data bases posting on the Commission’s website.<sup>10</sup>

## E. Pending Tariff Records

Only Tariff Record versions that are both accepted and effective are being migrated to new Tariff IDs at this time. There are no tariff records with a pending status to be migrated to Tariff ID 42.

## F. Pending Cancellations

NorthWestern thoroughly reviewed its Tariff Records to develop the new tariff structure and prepare for this migration filing. In doing so, NorthWestern identified a handful of tariff records that could be canceled. NorthWestern has submitted a separate filing with Type of Filing Code 260 to cancel these existing records under Tariff ID 28.<sup>11</sup> Because these records are pending cancellation, NorthWestern is *not* migrating them to new Tariff IDs.

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<sup>9</sup> Because of the number of records to be migrated, NorthWestern anticipates the filings will take multiple days. Therefore, NorthWestern plans to migrate one set of records at a time — *i.e.*, submit the Code-390 filing to establish Tariff ID 37 for the MBR Tariff; then cancel Record ID 128; submit the Code-390 filing to establish Tariff ID 38 for the Reserve Energy Service Tariff; then cancel Record ID 230; *et cetera*.

<sup>10</sup> See FERC Staff’s Responses to Discussion Questions, p. 63, *et seq.*

<sup>11</sup> This cancellation filing was submitted in Docket No. ER19-3-000.



### III. Proposed Effective Date & Request for Waiver

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Pursuant to 18 C.F.R. § 35.11, NorthWestern respectfully requests waiver of the prior notice filing requirement under 18 C.F.R. § 35.3 to permit an effective date of October 8, 2018, for this filing. Good cause exists to waive the prior notice requirement because NorthWestern is not submitting revisions to any tariff, service agreement, or rate schedule on file with the Commission as part of this proceeding; rather, NorthWestern is migrating existing tariff records to a new Tariff ID. Thus, waiver will minimize the complexity of tracking tariff filings that bridge the effective dates of the existing and new Tariff IDs.

To the extent necessary, NorthWestern respectfully requests waiver of any other requirements under Part 35 necessary for acceptance of this filing. Specifically, NorthWestern is not submitting any cost support materials or price index criteria, as those materials were submitted when the tariff, service agreement, or rate schedule was originally filed with and accepted by the Commission. In addition, because is not proposing any changes to the existing tariff records, NorthWestern is not submitting marked versions of the tariff records.

### IV. Contents of Filing

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This filing establishes new Tariff ID 42 and includes the following documents:

- 1) This transmittal letter;
- 2) Attachment A, list of tariff records being migrated from existing Tariff ID 28 to new Tariff ID 42;
- 3) Clean tariff records for posting on eLibrary; and
- 4) Electronic filing package containing the tariff records and associated metadata to be migrated to new Tariff ID 42.

### V. Service

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NorthWestern Energy will provide a copy its migration filings to each affected customer, the Montana Public Service Commission, the South Dakota Public Utilities Commission, and the Southwest Power Pool, Inc. In addition, this filing will be posted on NorthWestern's OASIS.<sup>12</sup> Copies are also available for public inspection at NorthWestern Energy's Corporate Office, 3010

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<sup>12</sup> <http://www.oatioasis.com/NWMT/index.html>



West 69<sup>th</sup> Street, Sioux Falls, South Dakota, and the Montana General Office, 11 East Park, Butte, Montana.

## VI. Communications

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Communications concerning this filing should be directed to the following persons, who should be included on the official service list compiled by the Secretary in this proceeding:

Michael Cashell  
Vice President – Transmission  
NorthWestern Energy  
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## VII. Conclusion

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For the foregoing reasons, NorthWestern respectfully requests the Commission to accept this migration filing to establish Tariff ID 42 with an effective date of October 8, 2018.

Respectfully submitted,

s/ *M. Andrew McLain*

**M. Andrew McLain**

*Director – Transmission Market Strategy & FERC Compliance Officer*

andrew.mclain@northwestern.com

○ 406-443-8987



## Certificate of Service

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I hereby certify that I will serve the foregoing document upon each person designated in the foregoing transmittal letter, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated this 2<sup>nd</sup> day of October, 2018.

*s/ Dori Quam*

Dori Quam

Lead – Transmission Regulatory Support

dori.quam@northwestern.com

**New Tariff ID:** 42**Tariff Title:** Other Rate Schedules**Program Code:** E - Federal Power Act Electric (Traditional Cost of Service and Market Based Rates)  
Public Utility**Organization:** NorthWestern Corporation (Federal Power Act)

Existing Tariff ID 28			New Tariff ID 42		
Existing Section Title	Record ID	Parent ID	New Section Title	New Record ID	Parent ID
N/A (New Title Page)	N/A	N/A	Rate Schedules - South Dakota	3649	N/A
Rate Schedule FERC No. 38-SD - NWE-SD Agreements with WAPA	3419	N/A	RS 38-SD - NWE-SD Agreements with WAPA	3650	3649
Contract for Interconnection and Tie Lines (SD)	3420	3419	Contract for Interconnection and Tie Lines (SD)	3653	3650
Contract for Consolidated Facility Arrangements (SD)	3421	3419	Contract for Consolidated Facility Arrangements (SD)	3657	3650
General Interconnection Contract Provisions	3422	3419	General Interconnection Contract Provisions	3660	3650
RS 39-SD Big Stone Plant Transmission Facilities Agreement	3500	N/A	RS 39-SD Big Stone Plant Transmission Facilities Agreement	3663	3649
RS 40-SD - Coyote 1 Transmission Facilities Agreement	3501	N/A	RS 40-SD - Coyote 1 Transmission Facilities Agreement	3664	3649
N/A (New Title Page)	N/A	N/A	Rate Schedules - Montana	3665	N/A
Rate Sch FERC No. 27 - 2d Revised Amps Agreement	2763	N/A	RS 27 - Amps Agreement	3669	3665
Montana Intertie Project Transmission Agreement	227	N/A	RS 185 - Montana Intertie Project Transmission Agreement	3671	3665
Revised Exhibits to Montana Intertie Agreement	228	227	Exhibits to Montana Intertie Agreement	3673	3671
Colstrip Units #1 and #2 Transmission Agreement	225	N/A	RS 188 - Colstrip Units 1 and 2 Transmission Agreement	3675	3665
Colstrip Transmission Agreement	146	N/A	RS 190 - Colstrip Transmission Agreement	3677	3665
Rate Sch FERC No 242: WECC Unscheduled Flow Mitigation Plan	3040	N/A	RS 242 - Unscheduled Flow Mitigation Plan	3681	3665
NorthWestern Corp. Revised Rate Schedule FERC No. 244 (MT)	150	N/A	RS 244 - NWE-Montana Agreements with WAPA	3688	3665
Contract for Interconnection and Tie Lines	147	150	Contract for Interconnection and Tie Lines (MT)	3689	3688
Ex A - Points of Interconnection Tie Lines and Facilities	3413	147	Ex A - Points of Interconnection Tie Lines and Facilities	3692	3689
Ex B - Authorized Representatives and Notice	3414	147	Ex B - Authorized Representatives and Notice	3693	3689
Contract for Consolidated Facility Arrangements	3409	150	Contract for Consolidated Facility Arrangements (MT)	3694	3688
Ex A - Consolidated Facility Arrangements	3410	3409	CFA Exhibit A	3697	3694
General Interconnection Contract Provisions	3412	150	General Interconnection Contract Provisions	3698	3688
Rate Sch FERC No 253 - NTTG Funding Agreement	232	N/A	RS 253 - NTTG Funding Agreement	3702	3665



**New Tariff ID:** 42**Tariff Title:** Other Rate Schedules**Program Code:** E - Federal Power Act Electric (Traditional Cost of Service and Market Based Rates)  
Public Utility**Organization:** NorthWestern Corporation (Federal Power Act)

Existing Tariff ID 28			New Tariff ID 42		
Existing Section Title	Record ID	Parent ID	New Section Title	New Record ID	Parent ID
NorthWestern Corp. First Rev. FERC Rate Sched. No. 257 (MT)	131	N/A	RS 257 - BPA Self-Supply Agreement	3788	3665
Coordinated Operating Agreement with Wind Watch	231	N/A	RS 270 - COA with NaturEner Wind Watch LLC	3792	3665
REC Silicon Emergency Assistance Agreement	144	N/A	RS 270-REC - REC Silicon Emergency Assistance Agreement	3793	3665
REC Silicon Agreement	145	N/A	RS 271 - REC Silicon O and M Agreement	3794	3665
RS 324 - NWE-BPA Interface Capacity Settlement Agreement	3796	N/A	RS 324 - NWE-BPA Interface Capacity Settlement Agreement	3798	3665