## NorthWestern Energy Docket GE16-005 South Dakota 2017 DSM Filing

South Dakota Public Utilities Commission First Data Request (1-1 – 1-12)

Data Requests received December 7, 2016

1-8) Based on the results of the first two years of the DSM program and the benefit/cost test forecasts for the 2017 DSM Plan year, Staff requests additional time to work with NorthWestern on its DSM plan filing for 2017. What impacts would there be to the DSM program if the DSM Plan is suspended until March 1, 2017 pending Commission approval?

## **RESPONSE:**

Uncertainty as to whether or not rebates are available negatively impacts customer and trade ally participation. Additionally, NorthWestern is concerned that such a suspension may hinder the ability to retain the two DNV GL audit staff and one DNV GL outreach staff person located in South Dakota. As noted previously, hiring qualified personnel for these positions proved challenging. Investments have been made to hire and train staff. Should a delay of the 2017 offerings occur, both the cost recovery to compensate DNV GL for staff (located in both Montana and South Dakota) assigned to the South Dakota DSM programs and the risk of losing the qualified South Dakota staff due to uncertainty of the future South Dakota DSM program are potential impacts.

Should the staff be lost due to uncertainty or an inability to recover costs to compensate DNV GL during the suspension and then programs resume, there will be costs in both time and money to hire and train new staff and to re-engage with customers and trade allies.

There will also need to be appropriate messages developed to communicate with trade allies and customers during such a suspension as to minimize degradation of customer awareness and participation and the program infrastructure that has been developed over the past two and a half years. See the response to Data Request 1-9.