

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 Sally Neal

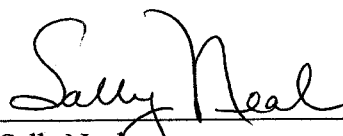
STATE OF MONTANA)
 : ss
COUNTY OF SILVER BOW)

Sally Neal, being first duly sworn upon oath, states and alleges as follows:

- 1) I am the Director - Records Management Systems for NorthWestern Corporation d/b/a NorthWestern Energy. I submit this affidavit in support of NorthWestern Energy's Resistance to Oak Tree Energy, LLC's Second Motion to Compel.
- 2) Records management assists the NorthWestern's legal and regulatory affairs departments in responding to discovery requests. Records management searches the company's electronically stored information (ESI) and physical warehouses for potentially responsive documents.
- 3) To respond to Request for Production No. 40, our legal department has identified seven employees whose email must be searched. It will take 45-60 days to search the email, capture the records, and review the results for relevant and privileged content.
- 4) In addition to searching email, records management searches all other storage locations including network drives, hard drives, and physical warehouses. It will take 45-60 days to search all storage locations, capture the records, and review the results for relevant and privileged content.

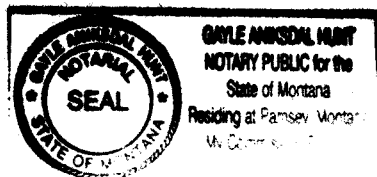
Further affiant sayeth naught.

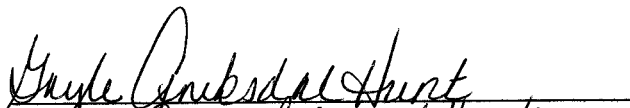
Dated this 14th day of February, 2012.



Sally Neal

Signed and sworn to before me this 14th day of February, 2012, by Sally Neal.





Name: Gayle Anksdal Hunt
Notary Public for the State of Montana
Residing at: Ramsay, Montana
My commission expires: August 18, 2012