



Submission Description: (doc-less)

Motion to Intervene of Beartooth Electric Cooperative, Inc. under ER19-1756-000

Submission date: 5-21-2019

Filed date: 5-21-19

Dockets

ER19-1756-000 NorthWestern Corporation submits tariff filing per 35.13(a)(1): Montana OATT Formula Rate (Part 1) submitted on 5-1-2019 3:30:00 PM, Filing Type code: 320

Filing Party/ Signer (Representative)

Beartooth Electric Cooperative, Inc

Kevin P. Owens, PE

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Basis for Intervening:

Description of Beartooth Electric Cooperative (“BEC”) and Basis for Intervening in Docket No. ER19-1756-000:

Beartooth Electric Cooperative, Inc. is a rural electric power cooperative located in the State of Montana, headquartered in Red Lodge, MT.

Beartooth Electric Cooperative, Inc. started in 1938 when the State of Montana approved conversion of the Stillwater Rural Electrification Association in Absarokee, Montana to the Beartooth Electric Cooperative, Inc.

Now a modern electric utility, BEC serves the rural areas of Stillwater, Carbon and Sweetgrass Counties in Montana and Park County, Wyoming. Power is delivered to its members over 1,814 miles of line fed from 10 substation connected to NWE’s 50 kV and 100 kV transmission system. In 2018 BEC delivered 74.2 million kwhs to its 4600 members. Annual revenue in 2018 was \$8.6 million.

BEC has electric supply contracts with the Western Area Power Administration and Morgan Stanley for and on behalf of its Members. Transmission and related services, including regulation service, for the deliveries are received from NorthWestern Corporation under NorthWestern’s Montana Open Access Transmission Tariff (“OATT”) and BEC is allocated a portion of the costs associated with these services.

BEC has adopted a successful Business Model as a strategic tool to operate the utility and maintain financial stability five to seven years into the future. Capital, O&M and power costs need to be stable and predictable to provide affordable rates to its members.

BEC is one of only two electric cooperatives in the State of Montana not served by a G&T Cooperative or federal PMA. BEC has contracts in place to deliver wholesale power through 2027.

NWE's proposed OATT filing will increase BEC's transmission delivery expenses 53.8%, approximately \$250,000. That dollar increase is equivalent to the Cooperative purchasing a new fully equipped line truck. BEC's Business Model would add such an expense into its financial business model as a planned expense several years out into the future so as not to adversely impact member margins. BEC does not have the financial luxury of buying a new line truck with 3 months' notice. The magnitude and timing of this filing by NWE does not adequately take into account the financial constraints and Business Model of a small rural electric cooperative in Montana.

Beartooth Electric Cooperative, Inc. therefore has a direct interest in this proceeding concerning NorthWestern's revisions to its OATT and a right to intervene, offer comment and to participate to protect its interests and the interests of its Members.

BEC's participation in this proceeding is necessary and appropriate to the administration of the Federal Power Act, and will be in the public interest. BEC's interests will be directly affected by this proceeding, and will not be adequately represented by any other party. Accordingly, BEC requests that the Commission grant Beartooth Electric Cooperative, Inc. intervener status in this docket and to make it a party to this proceeding for all purposes.

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