

**Families for a Livable Climate  
Montana Chapter of the Sierra Club  
Montana Environmental Information Center  
Northern Plains Resource Council  
350-Montana**

October 26, 2020

City of Bozeman  
Attn Natalie Meyer or Jon Henderson  
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Sent via email: [agenda@bozeman.net](mailto:agenda@bozeman.net)

Dear City of Bozeman Representatives:

We appreciate the City of Bozeman's strong commitment to addressing climate change and its commendable goals for reducing carbon emissions. The City of Bozeman has demonstrated this commitment by adopting Commission Resolution No. 4866, a resolution that shows Bozeman's desire to be a leader in attaining a clean energy future and to meaningfully reduce greenhouse gases. The Draft Bozeman Climate Plan for 2020 (Draft Plan) attempts to exemplify this commitment. Throughout the plan, the City of Bozeman remains steadfast in its dedication to adopting a plan that sources 100% of Bozeman's energy from clean resources. The Draft Plan also continually emphasizes the commendable goals of protecting the environment, human health, and promoting equity by ensuring that Bozeman's residents pay a fair rate as the City transitions to clean energy.

However, we are very concerned that these aspirations will not reduce greenhouse gases and this Draft Plan, as currently written, will not succeed in helping Bozeman attain its climate goals. The overreliance on the assumption that NorthWestern Energy (NorthWestern) will reverse course and embrace clean energy raises red flags about the future success of Bozeman's plan.

Actions speak louder than words. NorthWestern has repeatedly argued to legislators, the Montana Public Service Commission, and the courts that it cannot increase renewable energy and can only move toward increased fossil fuel reliance.<sup>1</sup> Its representative recently expressed

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<sup>1</sup> **NorthWestern has committed to significantly expand its fossil-fuel generation.**

- NorthWestern Energy is exclusively seeking to acquire more coal and gas-fired power plants. *In fact, it is the only utility in the country that is seeking to expand its coal-fired generation.* (See [SB 278](#) and [SB 331](#) from the 2019 Legislative Session, and PSC Docket D2019.12.101 in which NorthWestern is proposing to acquire a larger share of Colstrip Unit 4, one of the largest greenhouse gas emissions sources in the country).
- NorthWestern's [2019 Resource Procurement plan](#) details its plan to build a billion-dollar fleet of new natural-gas generators within the next five years. The Plan concludes that only "thermal

the same concern in a Bozeman Daily Chronicle [article](#). NorthWestern is an outlier among utilities in the west. While other utilities successfully move toward cleaning up the grid, NorthWestern bullishly moves in the opposite direction. Its recently adopted 20-year resource acquisition plan includes the addition of ***no new renewable energy*** and an enormous and expensive increase in fossil fuel generating facilities. NorthWestern's current behavior at the state level and in the courts will lock in increased greenhouse gas emissions for generations. This is a partner that Bozeman should engage with cautiously, with serious and quantifiable short-term benchmarks, with firm commitments from NorthWestern upfront, and with strategies to either force NorthWestern to clean-up its grid or to work around NorthWestern if it fails to meet Bozeman's goals. Again, hoping NorthWestern will behave differently than it has in recent years is aspirational but unrealistic.

The Draft Plan, developed by an extraordinary group of committed volunteers, contains much to applaud. Of the six focus areas, most contain actions that can be taken by the City and community members. The City should immediately move forward with adopting and implementing those sections. This letter will focus on the need to improve Focus Area 2.

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resources,” such as coal and natural gas, will meet its needs. These actions would *more than double* our utility's carbon emissions.

- **NorthWestern has manipulated its modeling to avoid adding renewable resources to its portfolio.** NorthWestern claims that renewables are unreliable and economically infeasible yet the PSC's independent expert<sup>0</sup>.. found that the utility manipulated its modeling data to reach that erroneous conclusion. (“[Comments on NorthWestern Energy's Final 2019 Electricity Supply Resource Procurement Plan](#)”, Prepared for the MT Public Service Commission by Synapse Energy Economic, February 14, 2020)
- **NorthWestern has lost multiple lawsuits regarding its efforts to illegally block affordable renewable energy projects**, including two recent Supreme Court cases in which the court called NorthWestern's arguments against solar unsupported. *Vote Solar v. Montana Department of Public Service Regulation*; 2020 MT 213. *MTSUN v. The MT Department of Public Service Regulation*, 2020 MT 238.
- **NorthWestern has consistently failed to meet Montana's modest renewable portfolio standard (RPS)** since it went into effect in 2012, repeatedly requesting a waiver from the PSC for the community renewable energy projects provision of the law.
- **NorthWestern has been a fierce opponent of solar energy in the legislature.** Last year, it spent hundreds of thousands of dollars on a study that proposed eliminating net metering, a move that would have destroyed our state's growing solar industry. It has also repeatedly lobbied against lifting Montana's cap of 50kW on solar systems, severely limiting solar capacity for schools, municipalities, and businesses.
- **In order to block a solar-plus-storage project proposed in Montana, NorthWestern appealed to the Trump-appointed Federal Regulatory Energy Commission.** The resulting decision on Sept. 1, 2020, not only granted NorthWestern's request to disqualify the project, but reversed 40 years of precedent supporting the addition of renewable energy on the nation's electrical grid. This decision is a staggering setback for increasing the reliability and economic feasibility of clean energy projects.

## Focus Area 2: Responsible & Reliable Renewable Energy Supply

As a fundamental matter, it was inappropriate to have an undisclosed member of the Board of Directors of NorthWestern Energy as a consultant involved with developing and facilitating this section of the Draft Plan. The conflict of interest created by engaging a Board member of NorthWestern, who has a fiduciary obligation to the corporation, (in addition to the appointment of two high-level NorthWestern employees to the Climate Team), fundamentally undermines the credibility of this section. One is left to wonder if the bias in favor of NorthWestern that is evident throughout in this section of the plan would exist had this conflict not occurred. To put it mildly, this section needs work and should be revised before being considered by the Commission.

Focus Area 2 is slated to attain the greatest greenhouse gas reductions, but unfortunately, it contains the most significant flaws.<sup>2</sup> Electricity usage accounts for the greatest share of the City's greenhouse gas emissions. The critically important Focus Area 2, "Responsible and Reliable Renewable Energy Supply,"<sup>3</sup> proposes the following solutions:

- Solution (D) Increase Utility Renewable Energy Mix: Support NorthWestern Energy to meet and surpass their 2045 goal to reduce the carbon intensity of their generation by 71% to 0.14 MT CO<sub>2</sub> per MWh.
- Solution (E) Increase Community Participation in Utility Green Power Programs: Collaborate with NorthWestern Energy to introduce a subscriber-based green tariff.
- Solution (F) Increase Community-Based Distributed Renewable Energy Generation: Work across the community to increase the adoption of distributed renewable energy on public and private properties.

The Draft Plans primary solutions, (D) and (E), and (F), largely rely on NorthWestern Energy to proactively add more renewable energy to its portfolio, phase out fossil fuel generation, support expanded distributed generation, and embrace meaningful "green" energy policies. While these are laudable goals, as previously stated, NorthWestern's current practices are exactly counter to the City's goals. The Draft Plan should include far more information on what the City can and will do to move clean energy forward with or without NorthWestern.

Section (D) is the primary mechanism to achieve carbon neutrality by 2050 and the second leading mechanism to meet the City's 2030 goal.<sup>4</sup> Yet it contains numerous flaws. First and foremost, the only solution listed on page 60 for increasing renewables is "Support NorthWestern Energy to meet and surpass" its climate goal. As explained below, NorthWestern's climate goal is deceiving and runs counter to climate goals set by other utilities across the west. Furthermore, increasing the utility's renewable energy mix requires far, far more than simply supporting NorthWestern's efforts.

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<sup>2</sup> Figure 17 (p.16), which illustrates needed carbon reductions over time appears to be divorced from the plan; It lacks any context, legend, reference to data, and is not discussed in the text of the Draft Plan.

<sup>3</sup> Draft Plan, pages 60-77.

<sup>4</sup> Draft Plan, Appendix A, p. A2

## NorthWestern’s climate goal is a gimmick that allows it to increase emissions

One of the most concerning aspects of the plan is that the City of Bozeman adopts NorthWestern’s misleading metric to calculate carbon emission reductions. Instead of committing to reduce greenhouse gas emissions by a date certain as other western utilities have done,<sup>5</sup> NorthWestern uses a novel and misleading metric called “carbon intensity.” Unfortunately, Focus Area 2 of the Draft Plan also relies on this metric to attain its reduction goals.

In December 2019, at the same time that NorthWestern announced plans to buy *more* of the Colstrip plant and thus increase its emissions, it also announced its new goal – to reduce carbon intensity by 90% by 2045.<sup>6</sup> This novel approach allowed NorthWestern to immediately claim that it was already half-way to its 2045 goal despite adding a gas plant to its fleet and continuing to rely on the same amount of coal-based electricity during that period. The addition of the hydroelectric system allowed NorthWestern to claim the percentage of greenhouse gas emissions compared to its overall portfolio’s megawatt output had declined – yet not a single ton of greenhouse gases was reduced or avoided. NorthWestern used “carbon intensity” to claim it was doing its part to address the climate crisis despite doing nothing to decrease real-world emissions.

While other utilities state their climate goals in terms of emission reductions – usually in terms of tons of carbon dioxide equivalent reduced – NorthWestern uses a term that allows it to claim a 50% reduction in greenhouse gases in the last decade, despite its increasing reliance on fossil fuels. And moving forward, NorthWestern has publicly said it intends to add no new renewables, to increase its share of Colstrip, and to add 800 megawatts of gas. Reducing carbon intensity does not require reduced emissions. Tackling climate change does. NorthWestern’s metric is simply a sleight-of-hand accounting trick.

Unfortunately, the Draft Plan follows NorthWestern’s lead. Instead of establishing goals that reduce real and verifiable greenhouse gas emissions, Focus Area 2 establishes carbon intensity as the “Performance Measures” in each strategy. As stated in the Appendices, “NorthWestern Energy’s carbon reduction plan presented in ‘Our Vision for Montana’ was used as the baseline scenario. This report projects emissions reduction through 2045.”<sup>7</sup> By using “NorthWestern

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<sup>5</sup> Examples of other western utilities carbon reduction goals includes, but is not limited to, the following:

**Idaho Power** has a goal of 100% clean energy by 2045 (<https://www.idahopower.com/energy-environment/energy/clean-today-cleaner-tomorrow/>);

**Avista** has a goal of carbon neutrality by 2027 for its electricity supply and 100% clean energy by 2045 (<https://www.myavista.com/about-us/our-commitment>).

**Public Service of New Mexico** eliminate carbon emissions from its power supply by 2040 (<https://www.pnm.com/042219-pathto100>);

**Arizona’s largest utility APS** will remove coal from its portfolio by 2031 and be carbon-free by 2050 (<https://www.aps.com/en/About/Our-Company/Clean-Energy/Stakeholder-Perspectives>);

**Colorado-based Xcel** energy committed to reducing emissions by 80% by 2030 and providing carbon-free electricity by 2050 ([https://www.xcelenergy.com/company/media\\_room/news\\_releases/xcel\\_energy\\_aims\\_for\\_zero-carbon\\_electricity\\_by\\_2050](https://www.xcelenergy.com/company/media_room/news_releases/xcel_energy_aims_for_zero-carbon_electricity_by_2050))

<sup>6</sup> N. Ouellet, Montana Public Radio, *NorthWestern to Increase Colstrip Unit 4 Stake by 25 Percent for \$1*, available at <https://www.mtpr.org/post/northwestern-increase-colstrip-unit-4-stake-25-percent-1>.

<sup>7</sup> Draft Plan, Appendix A.6

Energy’s carbon reduction plan,” the City then conflates carbon *intensity* with carbon *emissions*. This deprives Bozeman’s citizens of a meaningful plan to reduce emissions. Adopting NorthWestern’s strategy, the City of Bozeman then validates NorthWestern’s flawed metrics by creating a Plan that does not necessarily result in actual emissions reductions.

### **Action 2.D.3. Support Policies to Expand Renewable Energy and Just Transition Initiatives**

This section provides a laundry list of policies the City will consider supporting to reach its goals. Unfortunately, this incomplete list reads more like a NorthWestern wish-list and not an independent list of policies that will truly help the City meet its goals. For example:

- The list contains no mention of the City working to expand net-metering or other renewable energy policies, let alone whether NorthWestern has indicated a willingness to support such measures.
- It fails to mention that the City should oppose NorthWestern’s efforts to increase fossil fuel reliance. Instead it only mentions eliminating small, but admittedly filthy, qualifying facilities that NorthWestern has repeatedly tried to remove from its portfolio through legislation. This omission is notable as NorthWestern attempts to buy a larger share of one of the dirtiest coal plants in the nation and significantly increase its reliance on new gas plants.
- This section mentions a decline in coal in Montana as if somehow that impacts NorthWestern customers. NorthWestern’s coal reliance has not changed in over a decade and has not resulted in any decrease in greenhouse gas emissions in its portfolio or decreased air or water pollution near any coal mines. It’s bizarre that this statement is included since it is patently false on many levels, particularly when it comes to NorthWestern’s resource mix.
- We strongly support just transition initiatives, but NorthWestern has opposed them every time they have been proposed.<sup>8</sup> Other utilities that own the Colstrip plant have contributed \$13 million to the community and workers in Colstrip for transition purposes. NorthWestern has refused to make such a commitment despite having had numerous opportunities to do so. Furthermore, transition funding should be qualified to guarantee that the funding goes toward workforce development and retraining programs and impacted tribal entities and is not used to punish utilities for their efforts to move away from fossil fuels, as was unsuccessfully proposed in the 2015 and 2017 legislative sessions.

The first solution in Focus Area 2, calls for Bozeman to “Support NorthWestern Energy to meet or surpass” its 2045 goals. The City’s primary reduction strategy depends on NorthWestern moving in a direction that it has already told the PSC that it will not go. The Draft Plan fails to acknowledge that the City may need to push NorthWestern in the direction of clean energy instead of simply ***supporting*** NorthWestern’s nonexistent clean energy proposals. The Draft Plan should incorporate language that makes it clear that it will work with NorthWestern to meet

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<sup>8</sup> NorthWestern [filing](#) opposing transition funding in PSC Docket No. D2018.4.24; [HB 489](#) 2019 MT Legislature; 2018 Rate Case PSC Docket D2018.8.12, NorthWestern Energy’s Reply Brief, Aug. 28, 2019 and NorthWestern Energy’s Opening Brief filed Aug. 10, 2019.

Bozeman’s goals instead of relying on NorthWestern to meet its false reduction standard. The language should read, “Encourage and Move NorthWestern to meet Bozeman’s climate goals.”

The Draft Plan also states that the City will support policies to address NorthWestern’s “electric capacity shortfall.”<sup>9</sup> This statement is loaded and does not belong in this document.

NorthWestern claims to have a very large capacity shortfall that requires it to own more of Colstrip and to add another 800 megawatts of gas generation. NorthWestern’s analysis has been severely criticized by many experts, including the Montana Consumer Counsel, experts hired by the MT PSC, and other entities involved in PSC proceedings. This statement is fraught with assumptions that have no support in the Draft Plan. It is inappropriate for the Draft Plan to reference this without additional explanation, detail, and supporting evidence. If the City includes this statement it must put sideboards on what types of projects the City is willing to support and why it agrees that NorthWestern has a capacity shortfall.

For NorthWestern to be a partner with Bozeman, it should embrace Bozeman’s goals, prove that it is interested in decreasing the utility’s reliance on climate-altering fuels such as coal and gas and expanding its reliance on clean energy sources such as efficiency, conservation, and renewable energy.

### **Decoupling: Section 2.D.3 and Action 2.F.3**

Section 2.D.3 mentions support for “decoupling utility revenue from electricity sales” but fails to mention that decoupling without an explicit and enforceable requirement for the utility to increase energy efficiency will only be a mechanism to increase revenues for the utility without increasing the deployment of clean energy. Any decoupling mechanism must be tied to a clear and enforcement obligation for the utility to increase energy efficiency.

Action 2.F.3 which discusses decoupling for distributed renewable energy generation is of serious concern.<sup>10</sup> NorthWestern has repeatedly lost in its quest to require net-metered customers to pay more. Decoupling of these resources could very well be a backdoor mechanism to achieve NorthWestern’s goal of charging net-metered customers more than the legislature has established. Decoupling may be appropriate for increasing energy efficiency resources in certain circumstances, but Bozeman should be extremely skeptical of any proposal to decouple distributed generation. More detail should be provided to allow the community to understand how such a proposal would work and to guarantee it would not undermine residential or commercial net-metering customers.

### **Solution E. Increase Community Participation in Utility Green Power Programs.**

This section poses important questions that should be answered before the adoption of the Draft Plan to give the community the information it needs to evaluate the efficacy of the program and the City staff the direction it needs to negotiate new green tariff programs with NorthWestern. Given that NorthWestern has repeatedly objected to any renewable energy investments in the next 20 years, much of the Draft Plan’s success falls to the Solution E: a “subscriber-based green

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<sup>9</sup> Draft Plan, p. 65

<sup>10</sup> Draft Plan, p. 74.

tariff.”<sup>11</sup> The Draft Plan identifies this notion as “a key strategy to meet the City’s aggressive short-term goals.”<sup>12</sup> Yet very little information is provided on how a green tariff could work, how much it may cost, and what limits there would be to the City’s involvement in such programs.

According to NorthWestern’s presentation on this topic,<sup>13</sup> some green tariffs are sourced from new renewable projects and some are not. Some are simply purchase agreements sourced on the open market and passed on to clients. The document makes vague references to additionality but does not commit to guaranteeing that outcome. The Draft Plan should clearly state that any participation would require the energy to come from new projects located in NorthWestern’s service territory.

This section leaves the consumer with many questions: What could the structure of a green tariff be? What would be considered clean energy? What are other cities in our region doing in this regard? Would there be a cost cap on tariff costs for the City of Bozeman and its taxpayers? Would it be affordable to low-income households? Would it result in the remainder of NorthWestern’s system, including customers in Bozeman, be more reliant on dirty electricity sources? Unfortunately, the Draft Plan fails to answer any of these questions.

The City of Missoula’s recently introduced “Missoula’s 100% Draft Options Report,”<sup>14</sup> and it does a fantastic job of describing the different types of green tariffs, the drawbacks of NorthWestern’s existing E+ Green program, additional resources on the topic, and program structures. The City and County of Missoula later sent a letter to the Montana Public Service Commission detailing that any green tariff program must include additionality.<sup>15</sup> The Draft Plan should provide the same level of detail for Bozeman and commit to the same.

The document fails to explore why NorthWestern’s existing E+ Green program has failed to attract customer interest. That is likely because people do not want to pay more for a less costly product and green energy is not additional. NorthWestern customers pay more for Colstrip each year than clean energy resources.<sup>16</sup> As clean energy prices continue to plummet it is increasingly unlikely that people would be willing to pay more to acquire a less expensive resource. Bozeman needs to be transparent in its Plan regarding the requirements of a green tariff program that is so heavily relied upon to reach the community’s goals.

## **SOLUTIONS**

The citizens of Bozeman deserve a sound, strong plan that reflects Bozeman’s commitment to protect our climate and leave a livable planet for future generations. Moreover, the plan created by Bozeman will become a model for other cities in Montana. It should embrace and embody the words used to define the elements of this plan in the introduction: bold, robust, innovative, and

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<sup>11</sup> Draft Plan, p. 60.

<sup>12</sup> *Id.*

<sup>13</sup> NorthWestern Energy [Presentation](#) to the Green Power Stakeholder Advisory Committee, February 20, 2020.

<sup>14</sup> Missoula’s 100% Clean Electricity Options Report, v2. Updated February 13, 2019. Pages 13-14

<sup>15</sup> Letter from the City of Missoula and Missoula County to the MT Public Service Commissions. July 9, 2020.

<sup>16</sup> “Residential Electricity Rates of NorthWestern Energy Through June 2018.” Prepared by Jason Brown, Montana Consumer Counsel

actionable. To that end, we offer several suggestions for improving and strengthening the “Responsible and Reliable Renewable Energy Supply” section:

- **Reject NorthWestern Energy’s “carbon intensity” metric.** “Carbon intensity” is not a valid or accurate measure of carbon emissions reductions. Relying on this misleading metric will lead to distortions in future calculations and the entire process of accounting for carbon emissions will lack integrity. Bozeman’s plan is rightly based on reductions in carbon emissions, not on reductions in the intensity (or rate) of carbon emissions, and that metric should be maintained throughout.
- **Set firm benchmarks for carbon emissions reductions over time.** The City must chart a course—with or without collaboration with the utility—with a specific time and reduction targets that are actionable and achievable. Short-term and long-term benchmarks are necessary. If NorthWestern fails to comply, there must be consequences, whether in the arena of public opinion, in alternative actions by the City, or the negotiation of subsequent contractual agreements.
- **Commit to “additionality” as a prerequisite for a green tariff.** Paying a premium for electrons from existing renewable projects will not lead to carbon emissions reductions. It is essential that any green tariff be sourced from a new, local renewable project. (“Local,” in this instance, means within our utility’s transmission area.) Transparency will be crucial for successful adoption by residential subscribers, and the City of Bozeman should reject any proposal, such as a “sleeved” power purchase agreement, that does not meet the criteria of “new” and “local.” The City must also determine and inform the public of the costs, fees, commissions, etc., related to the initiation and ongoing expenses of entering into a green tariff contract. Finally, a green tariff should not leave those that do not or cannot take advantage of the program with dirtier electricity.
- **Strengthen incentives for rooftop solar energy and adopt enabling building codes.** The opportunity to expand residential solar energy is huge. Systems now have a very short payback period—often less than 8 years. What is really needed to support that demand is subdivision design that enables an advantageous orientation and regulation from the City to protect residents’ investments in solar systems. The City should also advocate for the expansion of state tax credits for solar installations. Bozeman does not need to reinvent the wheel in this regard; many cities (and some states) are years ahead of us, and we can learn from them.
- **Establish sideboards and enlist the assistance of independent renewable energy experts to strengthen the City’s position when negotiating the Memorandum of Understanding with NorthWestern Energy.** NorthWestern has co-opted the process thus far with the extensive participation of management personnel and even a corporate board member guiding the meetings. When it comes time to negotiate the MOU, the City must provide clear guidance for its representative and be represented by an impartial, experienced expert on green tariffs.
- **Do not allow NorthWestern Energy to force concessions on issues such as decoupling and increasing its generation capacity.** The utility should not be leveraging its larger policy agenda against our local interests in renewable energy, and the City must avoid any efforts to force Bozeman’s support for flawed policies.
- **Collaborate with Missoula and Helena to increase our clout.** Whether it be our interactions with NorthWestern Energy, or our engagement with the Public Service



Commission and the state legislature, Bozeman's voice will be stronger if we join with like-minded cities seeking common purpose. We suggest setting up quarterly meetings to update each other, share ideas, and strategize on our common agenda.

- **The City of Bozeman must become a strong advocate for climate action and the adoption of renewable energy.** NorthWestern Energy has a large team of lobbyists for the legislative session, and it has highly paid executive positions devoted solely to influencing public policy related to its corporate interests. In order to compete, the City of Bozeman must devote more personnel resources to advocate for policies in support of climate mitigation and for energy efficiency investments and renewable energy development. For decades, renewable energy advocates have been losing to NorthWestern Energy in the legislature, as its lobbyists kill good bill after good bill. Uniting with Missoula and Helena to create a "climate lobby" that could harness public pressure and educate legislators and voters would be a good start. Further, the City of Bozeman should be participating in the hearings going on now at the Public Service Commission on our utility's application to get pre-approval for its Colstrip expansion. If approved, this expansion would make the City's carbon emissions reduction targets more difficult to achieve. The city should also explore the use of the Community Renewable Energy Project provision of Montana renewable energy standard to further its goals.
- **The City of Bozeman must seize every opportunity to strengthen awareness of climate change—in our actions as citizens and as a community.** We were pleased to read in the October 13<sup>th</sup> Bozeman Daily Chronicle about the City's decision to expand the solar array on the new public safety center, yet no mention was made of climate change, or the resulting long-term reductions in carbon emissions enabled by the technology, or the imperative to raise the 50kW cap on solar installations. We must not shy away from addressing this issue head-on. There is no "controversy" about the climate crisis and acknowledgement will help with public education on the topic.
- **Leverage the power of public opinion against our utility's worst behaviors.** Earlier this year, BlackRock Capital Investment Corp., the world's largest asset managing investment firm, announced that it was taking a close look at utilities' plans for addressing climate change. Its CEO told investors it would be divesting from companies earning 25% or more of their revenue from coal—a metric that would have been hard for NorthWestern to meet even before it sought to expand its ownership of Colstrip. BlackRock owns one-sixth of NorthWestern's shares and therefore has tremendous power over its financial viability, and BlackRock is not the only Wall Street firm setting expectations for ethical climate-related decisions by utilities. Many of the world's largest banks have adopted similar guidance on climate change. Bad investment ratings cause NorthWestern's stock price to sink and make it harder and more expensive to borrow funds for its ongoing operations and capital expenditures. In other words, NorthWestern Energy has an interest in portraying itself as "green," and it can do that by helping the City of Bozeman meet its carbon emissions reduction goals. By providing Bozeman clean renewable energy, it receives favorable media coverage and evidence of its commitment to climate sustainability to use in its annual report and other marketing tools for the financial sector and potential investors.

We urge the City of Bozeman to take more time to define and strengthen the portion of the plan that requires the greatest reductions in greenhouse gases. The Draft Plan is a critical document

for meeting the community's goals and deserves to be done thoroughly the first time. The community of Bozeman wants real, verifiable reductions in greenhouse gases. It is important for the City to provide that pathway.

Thank you for this opportunity to comment. Please let us know if you have any questions or comments. We look forward to Bozeman achieving its climate change goals.

Sincerely,

A handwritten signature in black ink that reads "Anne Hedges". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

Anne Hedges  
Montana Environmental Information Center

*Signing for*

350-Montana

Northern Plains Resource Council

Families for a Livable Climate

Montana Chapter of the Sierra Club