

Montana Public Service Commission
1701 Prospect Avenue
PO Box 202601
Helena, MT 59620-2601

Re: Docket No. 2025.05.038 – Joint Letter Requesting Integrated Resource Plan Public Listening Sessions Across NorthWestern Energy’s Service Territory

Dear Commissioners,

We are writing to respectfully request that the Commission hold public meetings across NorthWestern’s service territory, in each of the five commissioner districts, to solicit comments on NorthWestern Energy’s 2026 Integrated Resource Plan (IRP).

NorthWestern Energy released its draft IRP to the public on January 16, 2026, and intends to file its final IRP with the Commission on April 28, 2026. According to Montana’s Integrated Least-Cost Resource Planning and Acquisition Act, this filing will kick off a 120-day review period at the Commission, including a public comment period lasting at least 60 days. The legislature has also established that the PSC must host a minimum of two public meetings to solicit comments during this comment period. However, the Commission is not prevented from hosting additional public meetings.

In 2023, PSC staff acknowledged that “the public has a substantial interest in NorthWestern’s integrated resource planning and the resource acquisition decisions that follow,” and that “[r]esource decisions can have significant impacts on customer bills that last for decades.” Resource acquisitions resulting from the planning assumptions in this IRP could result in NorthWestern’s customers paying billions of dollars over the coming decades. This has tremendous implications for the future affordability and reliability of NorthWestern’s electric services for the approximately 900,000 Montanans living in NorthWestern’s service territory. Given the significance of NorthWestern’s 20-year planning process, we strongly believe that additional public meetings are warranted.

In 2023, the Commission held five public meetings on NorthWestern’s previous IRP in Great Falls, Helena, Billings, Butte, and Missoula. We acknowledge the time and resources that go into planning and hosting such public meetings, but we are confident they are more than worth it to encourage the best possible planning outcomes. These meetings were extremely valuable in 2023, as the Commission reportedly received over 450 written and oral comments on the plan. When Commission staff developed draft Commission comments on the 2023 IRP, specific public comments were referenced throughout the document as the basis for drawing staff’s attention to various issues within the IRP. Without this public input, the Commission might not have

identified some of the areas for improvement that were highlighted in the Commission's final comments to NorthWestern. We value the expertise of the Commission and its staff and recognize that public input can be tremendously valuable for helping to identify issues in the IRP, particularly given the agency's limited resources that are already stretched thin across numerous pending dockets.

The undersigned organizations were concerned by comments from a Commissioner at the February 3, 2026 business meeting, indicating a preference for holding only two public meetings on NorthWestern's IRP. At that same meeting, Commission staff indicated that the Commission has generally held one meeting in each commissioner's district to promote transparency and engagement with the public. Given the current heightened public scrutiny around NorthWestern's decision-making, particularly arising from the recent rate case, the proposed merger with Black Hills Energy, and the utility's plans for serving major data center loads, along with the many implications arising from this 20-year planning process, this transparency and public engagement are more important now than ever.

We acknowledge that, in accordance with updated requirements in Montana's Integrated Least-Cost Resource Planning and Acquisition Act, NorthWestern held four public meetings on its draft IRP in Great Falls, Missoula, Helena, and Bozeman between January 27 and February 4. While these meetings were important for the public to weigh in as NorthWestern finalized its draft IRP, they were not adequate as a substitute for the PSC hosting its own meetings. It remains unclear whether the public's concerns will be incorporated into the final IRP, and it will be crucially important for the public to have additional forums with the PSC to highlight issues that are not addressed. Additionally, NorthWestern's public meetings were not recorded, and the PSC did not participate in the meetings. It is important that the Commission hears the public's concerns, as the elected officials tasked with balancing the needs of utilities with those of their captive ratepayers.

Thank you for considering this request. We look forward to engaging further in this docket once the final IRP has been filed.

Sincerely,

Nick Fitzmaurice
Energy Transition Engineer
Montana Environmental Information Center

David Saslav
Chairman
Citizens for Clean Energy

Kyle Unruh
Director, Montana & Idaho
Renewable Northwest

Jeffrey Smith
Co-Chair
350 Montana

Sarah Stands
Director, Community Resiliency
Park County Environmental Council

Hannah Breslin
Sr. Manager, Advocacy & Campaigns
Protect Our Winters

Molly Bell
Political Director
Montana Conservation Voters Education Fund

Lauren McCloy
Utility & Regulatory Director
NW Energy Coalition

Joan Kresich
Board Member
Northern Plains Resource Council

Gary Matson
Science Advisor
Friends of Two Rivers, Inc.

Amy Cilimburg
Executive Director
Climate Smart Missoula

Phyllis Dorrington & Frank Kromkowski,
Co-Chairs
Helena Interfaith Climate Advocates

Lori Byron
Board Chair
MT Health Professionals for a Healthy Climate

Meridian Wappett
Attorney-Fellow
Western Environmental Law Center

Sarah Lundquist
Executive Director
Families for a Livable Climate

Hannah Gale
Program Director
Forward Montana

Kristin Blackler
Sustainability Director
Bridger Bowl Ski Area

Atty Moriarty
President
MT Chapter, American Academy of Pediatrics

Caryn Miske
Montana Chapter Director
Sierra Club