## MINUTES CITY OF LAUREL CITY COUNCIL WORKSHOP TUESDAY, DECEMBER 06, 2022

A Council Workshop was held in Council Chambers and called to order by Mayor Dave Waggoner at 6:31 p.m. on December 6, 2022.

## **COUNCIL MEMBERS PRESENT:**

_x_ Emelie Eaton	_x_ Heidi Sparks
x_ Michelle Mize	_x_ Richard Herr
_x_ Casey Wheeler	_x_ Irv Wilke
x Richard Klose	Bill Mountsier

#### **OTHERS PRESENT:**

Michele Braukmann, Civil City Attorney Brittney Moorman, Administrative Assistant Kurt Markegard, Public Works, and Planning Director

### **Public Input:**

Casey Felder, 1434 McMullen Lane, read the attached statement.

Steve Krum, 249 24th Avenue W, read the attached statement.

Aaron Felder, 1434 McMullen Lane, spoke regarding the information that has been presented in court. He asked that Laurel look at how they will stand on this issue.

Ray Southworth, 1632 Alderson Avenue in Billings, stated he is a member of the American Legion. He was born and raised in this town since 1953. He thanked Council for all that they do. It's a hard job.

#### **General Items**

1. Arbor Day 2023 Proclamation.

There was no discussion on this item.

2. Appointment of Sara Naylor and Fred Reilutz to the Laurel Fire Department.

There was no discussion on this item.

3. Appointment of Mary Nelson to the Library Board for a five-year term ending June 30, 2027.

The Library Director encouraged Council to appoint Mary to the Library Board. She has lived in Laurel for nine years and has been very involved with the Library, and she will bring roundness to the Library Board.

4. Appointment of Mike Kirschenmann to the Police Commission for a three-year term ending April 30, 2022.

There was no discussion on this item.

5. Appointment of Paul Kober to the Park Board for a four-year term ending December 31, 2026.

There was no discussion on this item.

6. Appointment of Jon Ruff to the Park Board for a four-year term ending December 31, 2022.

The term end date is 2026. There was a typo on the agenda. This appointment is for Jon Rutt.

7. Appointment of Irv Wilke to the Park Board for a four-year term ending December 31, 2022.

The term end date is 2026.

8. Appointment of Evan Bruce to the Park Board for a four-year term ending December 31, 2022.

The term end date is 2026.

9. Appointment of Evan Bruce to the Yellowstone Historic Preservation Board for a two-year term ending December 31, 2024.

There was no discussion on this item.

10. Appointment of Janice Lehman to the LURA - Advisory for a four-year term ending December 31, 2026.

It was questioned if LURA has enough people on their Board to be able to have their meetings. It was clarified that they now have enough members to have a quorum. However, they have not had a meeting, but will soon.

#### **Executive Review**

11. Resolution - Resolution Of The City Council Authorizing The Mayor To Sign A Memorandum Of Understanding Regarding House Bill 121.

This MOU is in response to House Bill 121. It changed who has the authority to make public health decisions during emergency circumstances. The Board will consist of Council Members from both Laurel and Billings, as well as County Commissioners. Laurel will have one City Council Member sit on this Board. Billings has requested a slight change to what constitutes as an emergency. Council will see that change reflected at next week's meeting.

12. Resolution - Resolution Of The City Council Of Intent To Adopt An Official Schedule Of Fees And Charges For The City Of Laurel And Repealing All Previous Resolutions That Set Fees Or Charges That Conflict With The Schedule Attached Hereto Upon Its Effective Date.

The Schedule of Fees is set yearly. These fees are set to be effective January 1, 2023.

13. Resolution - Resolution Of The City Council To Approve The Proposed Increase In The Rates And Charges For The Users Of The Municipal Solid Waste Facilities And Equipment To Be Effective January 1, 2023.

There will be a public hearing at next week's meeting to get public feedback before the Council's vote. Council was presented with the information three weeks ago; the public hearing will present the same information, just in a public format.

 Ordinance No. O22-07: An Ordinance Amending Section 14.04 Of The Laurel Municipal Code Relating To The Construction Board Of Appeals For The City Of Laurel

This is the second reading of this ordinance. There will be a public hearing at next week's meeting.

#### **Council Issues**

Park Board has three requests for a future Council Workshop. First, that no camping areas be opened for contractors during the CHS turnaround. Second, cameras be installed for both Riverside Park and Lions Park due to recent vandalism. Third, a report back on the request for a park maintenance district. They would also like an update on the reservations for shelters and buildings.

Pearl Harbor Day is tomorrow. There is a Pearl Harbor Day ceremony at the City Cemetery at 10:00 a.m. to honor people who were killed at Pearl Harbor. At noon at the Yellowstone National Cemetery, there will be another ceremony. The person who sent out the notice that we were under attack that day is buried in the Yellowstone National Cemetery.

It was requested that the City look into putting lights on Bernhardt Road by Walmart. The parking lots in the area are well-lit, but the street is very dark. There is a lot of traffic on this road, and some close calls have recently occurred.

### Other Items

# **Attendance at Upcoming Council Meeting**

## **Announcements**

The council workshop adjourned at 7:06 p.m.

Respectfully submitted,

Brittney Moorman

Administrative Assistant

NOTE: This meeting is open to the public. This meeting is for information and discussion of the Council for the listed workshop agenda items.

I am here to speak briefly about community. Community means a particular area or place considered together with its inhabitants. I have been a member of the Laurel community for over 40 years. I shop at the small, local businesses and the chain stores. I attend local events and support local causes. I do not live within the city limits. I do live within the Laurel community. The city's jurisdictional reach goes beyond it's city limits. Decisions have been made by the city county planning board and the Laurel city council that have affected me and my neighbors in the last several years. There's a highway commercial complex that was approved on Thiel Road even though the Laurel city-county planning board recommended against it. So far, the complex has not been a benefit to the area. Residents get to deal with commercial tenants who don't store hazardous chemicals correctly (in the floodplain mind you), their garbage and have been irresponsible with burning trash on a windy day which was quite a disaster and very scary for several of my neighbors. My point is that the city of Laurel should take charge of its community, whether inside the city limits or not. The city's growth plan is there to guide community leaders and support all community residents who might be impacted by the growth plan. Thank you for your time.

MyCopy

Hellos Mr. Mayor, Council Members.

Steve Krum, 249 24th Avenue West, Laurel, Montana 59044.

I do not live in the city limits, but I am a member of the Laurel Community and have been for over 60 years. Why am I here, our daughter Kasey, Granddaughter Madeline and Son-in-Law Aaron live just south of the proposed plant location. This plant is a danger and hazard to my family, their neighbors as well as the community of Laurel, from air, noise, and light pollution. We been fighting this plant for over a year now and will continue to do so because this plant does not belong in the Laurel Community.

Recently while going through NWE TESTIMONY AND EXHIBITS
May 2021 Before the Public Service Commission of the State of Montana DOCKET NO.
2021.02.022 Application for Approval of Capacity Resources Pages I found the Laurel site was not the original proposed site, not NWE first choice.

Recent research has turned up something I had only heard rumors about almost from the beginning of this issue, Billings said NO to this plant. Why didn't the Billings Chamber, Big Sky Economic Development Council or Billings local businesses want it in Billings?

The Original location was in Lockwood, west of the Exxon Refinery between Klenck Ln and Cerise Rd (Line 99 exhibit SAL-6 Page 18)

SAL testimony Page 8, Table SAL-1, two site visits are mentioned March 10 and 11<sup>th</sup> 2020. David Gates March 10<sup>th</sup>, and Lockwood March 11<sup>th</sup>.

To find the Exhibits in the testimony I had to go to the PSC site, enter the docket number and date.

In SAL testimony page SAL 18 it states there were 5 addendums, starting early March and no mention of any site change until May 11<sup>th</sup>

addendum 3, and addendum 4 making a comment that NWE would like it to be in Billings Area on May21st.

Somewhere during this time frame somebody raised a red flag to the project and it was quietly moved to the now Laurel site without any publicity, public hearings or comments from local businesses or news media. WHY and WHO said NO Billings location and even more curious, WHO said Yes to the Laurel Location?

Did the County Commissioners know about this? Not good enough for Lockwood, But okay for the Laurel Community? Was it the Billings Chamber or Business Community saying NOT RIGHT for Billings but okay for Laurel? Was Laurel Elected Officials aware of this and why? The Laurel Community needs to know the facts as to why not Billings but okay for Laurel, and why was it done so QUIETLY. We have Laurel Community residents and businesses that will be negatively impacted. The Mayor and City Council need to take a stand and get answers to these questions and take control of Laurel's future.

Finally, I would like to invite the Mayor, Council Members and CCPB to the Northern Plains Rally being held Tuesday, December 13<sup>th</sup>, between 11 a.m. and 12:30 a.m. at the Town Square. Our purpose is to raise awareness of Laurel residents of the negative impact and dangers of this plant to our community and to ask the Mayor and City Council to take a stand for Laurels future and follow the Their Growth Plan Laurel worked so hard on to plan for a better future for the Laurel Community. Thank You Mr. Mayor and Council members for your time and a Happy and Safe Holidays to You All....

Thank You.



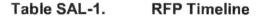
Before the Public Service Commission of the State of Montana

**DOCKET NO. 2021.02.022** 

**Application for Approval** of Capacity Resources

# **TESTIMONY AND EXHIBITS**

**May 2021** 



Activity	Timing	
RFP Announcement(s)	December 12, 2019	
Bidder Prequalification	December 2019 - January 2020	
RFP Release	January 31, 2020	
EPC Bidder Site Visits	March 10 - 11, 2020	
Bidder Web Conference 1	April 9, 2020	
Virtual EPC Site Visit	May 22, 2020	
Bidder Web Conference 2	May 28, 2020	
Proposal Due Date	July 10, 2020	
Phase 1 Evaluation (Completeness/Screen)	July and August 2020	
Phase 2 Evaluation (Short List Establishment)	September - November 2020	
Phase 3 Evaluation (Portfolio Selection)	December 2020 - February 2021	
Negotiations	February - April 2021	
Announcement of Selection	April 21, 2021	

#### How was the RFP announced?

On December 12, 2019, Aion announced the RFP by sending an email to
more than 450 entities to encourage participation from a broad range of
potential bidders. The announcement was also included on
NorthWestern's website and PRNewswire and a notice was also posted to
the Commission's website along with a copy of the draft RFP. Interested
potential bidders were instructed to contact Aion through a dedicated RFP
e-mail address in order to receive bidder prequalification materials.

9

10

# Q. Please describe the bidder prequalification process.

Upon receiving a response to the RFP announcement from an interested potential bidder, Aion sent bidder prequalification materials, including a

1		prequalification questionnaire and a non-disclosure agreement, to that
2		potential bidder.
3		
4		Aion reviewed the materials that the potential bidders submitted for
5		prequalification, evaluating safety records and relevant industry
6		experience. Only two potential bidders did not make the list of prequalified
7		bidders. Those potential bidders did not meet the safety standard for
8		prequalification. The safety prequalification requirement was based on
9		satisfying an average experience modification rate threshold of 1.0 over
10		the previous 3 years.
11		
12	Q.	How was the RFP issued?
13	A.	Aion issued the RFP to 60 prequalified bidders via the RFP email on
14		January 31, 2020.
15		
16	Q.	Did Aion document the announcement and issuance of the RFP?
17	A.	Yes. Aion provided NorthWestern with the Announcement,
18		Prequalification, and Issue report included as Exhibit SAL-3.
19		
20		RFP Roles and Responsibilities
21	Q.	Please identify the NorthWestern staff and external consultants who
22		supported the RFP process.
23	A.	The NorthWestern staff and external consultants who supported the RFP
24		process (collectively referred to as the "RFP Team") included:

NorthWestern Energy Montana 2020 RFP for Capacity Resources Docket No. 2021.02.022 Exh bit SAL-6-Public Version Page 14 of 47

Question No.	RFP / Specification Section Number	Question	Response	Additional Notes
41	DGGS Site Visit Question	Please describe the planned scope of supply and responsibilities for the DGGS on-site ammonia storage and forwarding system.	Ammonia forwarding pumps will be provided by the selected engine manufacturer as part of the owner furnished equipment (OFE). For a contractor not utilizing NorthWestern's OFE, Contractor must provide the ammonia forwarding pumps. Contractor will receive and set the new skid near the existing ammonia storage tanks. Existing ammonia pumps are located on the north side of the existing tanks. There are existing 2 inch drain connections on each ammonia tank that can be used to integrate the new pumps, but the drain capability must be maintained. There is space available for a new skid adjacent to the tanks, e.g., on the south side.	
42	DGGS Site Visit Question	At DGGS, are there access routes to the developable area that does not require going under the existing NH3/FO pipe bridges?	Yes. There is access on the south side of the existing units as well as on the far side of the fuel oil unloading area (east side).	
43	DGGS Site Visit Question	Does the water supply to the DGGS site come from the Silver Lake water supply?	Yes, the Silver Lake water supply supplies the plant Raw/Service Water system with an available supply of 2 MGD. Demineralized water is derived from this source. The demin water supply system can provide any necessary water for a new engine project. Projects utilizing other technologies that may require more water must not interfere with existing unit operation.	
44	DGGS Site Wisit Question	For DGGS, what is the available source of construction water?	For the construction water, the layout in Appendix B1 to the specification shows one location for a terminal point (hydrant); others are available, if needed.	
45	DGGS Site Visit Question	For DGGS, there are existing electrical transmission lines in the area of the developable site, what is planned for these transmission lines?	The north boundary of the developable area is adjacent to electrical lines, one of which falls within the boundary. This line will be relocated to along the south fence, outside of the developable area. This work will be performed by NorthWestern and will be completed prior to contractor mobilization.	
46	DGGS Site Visit Question	What is the plan for the existing spare GSU transformer at the DGGS site?	The base scope includes contractor furnishing and installing a new GSU transformer and circuit switcher. Owner will remove the existing GSU transformer prior to contractor mobilization. Owner will also make high side electrical tie-ins. For Alternate Scope and pricing, contractor is to assume that the existing transformer will be reused and that the terminal point is at the manhole near the existing PDC (TP-9[ALT) as identified in the layout included in Appendix B1 to the technical specification). Contractor would be responsible for providing electrical cabling at the manhole for connection to the low side of the GSU by Others.	
47	DGGS Site Visit Question	What is the available source for construction power at the DGGS site?	Contractor will need to apply for construction power with NorthWestern. For purposes of the bld, assume there is no fee for the application. Contractor will be responsible to provide step down transformers, breakers, and distribution from the source. The terminal point for this supply is identified on the layout drawing in Appendix B-1 of the technical specification but others may be available. An update will be provided to EPC Bidders if additional construction power terminal points are identified.	w
48	DGGS Site Visit Question	What was at the DGGS site prior to the Dave Gates Generating Station?	Nothing was in the area in the recent past. Mill Creek Substation was there prior to the construction of the DGGS.	
49	DGGS Site Visit Question	Are there any major underground utilities or sub-grade concerns in the developable DGGS area?	The Geotech package included in Appendix B1 to the technical specifications represents the currently available data.	
50	DGGS Site Visit Question	Is there an existing grounding grid in or near the DGGS developable area?	There is some existing grounding along the fence line. Available information will be provided via a formal Addendum to the RFP documents.	
51	DGGS Site Visit Question	Does the DGGS property end at the fence line?	Contractors can assume that space is available up to the fence line.	
52	DGGS Site Visit Question	What drove the decision to focus on RICE?	A full lifecycle technology assessment. However, NWE will consider other technologies as part of the all-source RFP.	
53	DGGS Site Visit Question	Can Bidder submit a bid with an alternate OEM besides the two OEMs NorthWestern is considering?	Yes. A turnkey bid would be required.	
54	DGGS Site Visit Question	Is an SCR system required, regardless of technology offered?	The emissions control equipment will need to meet Montana DEQ requirements, which is expected to require Best Available Control Technology [BACT].	
55	Lockwood Site Visit Question	Are there defined terminal points for the various site utilities at the Lockwood site?	Contractors will need to coordinate with the City for water supply, sewer, waste water, etc. For the basis of the proposals, additional information will be added to the layout drawing in Appendix B2 to the Technical Specification and provided to the bidders via a formal RFP Addendum.	

Question No.	RFP / Specification Section Number	Question	Response	Additional Notes
56	Lockwood Site Visit Question	What are the site drainage expectations at the Lockwood site?	For stormwater, contractors are to utilize natural drainage to existing ditches/drainage provisions. Contractor would need to determine if a retainage pond is required by local code. Contact storm water would need to be routed to a Contractor furnished oil/water separator and sent to city sewer. Contractors should coordinate with the City on any water discharge potential or limitations and/or how high water runs in the bermed canal on the north east side of the site to determine impacts on design, if any.	
57	Lockwood Site Visit Question	What is the intended natural gas supply to the Lockwood site, what capacity will be available, and would it also supply the nearby refinery?	NorthWestern will bring in a new high pressure gas line from a location about 3 miles southeast of the Lockwood site specifically for the power project. This line will be sized to provide the necessary capacity for the project. The terminal point will be on the south side of the site. Nominal gas pressure is assumed to be 300 to 400 psig. Contractor will be responsible for heating, regulation, and distribution.	
58	Lockwood Site Visit Question	In what direction will the electrical transmission exit the Lockwood site?	There will be a 230 kV interconnect on the southwest side of the site.	
59	Lockwood Site Visit Question	What are the existing monitoring wells being used for on the Lockwood site and will they need to remain in place?	The monitoring wells are in place to monitor ground contamination from a past release of solvents from a nearby site. Bidders are to assume that the monitoring wells are to remain in place.	
60	Lockwood Size Visit Question	Will local assembly of engines be required once they are delivered to the site?	The large engine option will require local assembly. The small engine option will not require local assembly (delivered as an assembled skid). The equipment supplier will assemble and set/align the RICE genests on the Contractor's foundations. Contractor will need to provide a level ground and gravel compacted assembly area for the large engine OEM to assemble the RICE genestes. Care, custody, and control of the engines will transfer to the Contractor when the OEM places them on the foundation.	
61	Lockwood Site Visit Question	What is the setback distance at the Lockwood site?	Bidder is referred to the municipality's guidance that can be found online at the municipality's website.	
62	Lockwood Site Visit Question	Will the electrical lines on the north side of the Lockwood site be required to remain in-place?	NorthWestern can move the electrical lines if necessary for contractor's design. Bidders should indicate if this is necessary in their Proposal. If proposed, NorthWestern will consider the cost and schedule associated with such in the Proposal evaluation.	
63	Lockwood Site Visit Question	Is there an available geotech report for the Lockwood site?	No; a geotech study is currently not available.	
64	Lockwood Site Visit Question	Does NorthWestern have an option on the Lockwood property?	Yes.	
65	Lockwood Site Visit Question	Will there be an operation center for remote dispatch of the Lockwood site?	Yes. The remote dispatch center will be located in Butte.	
66	Lockwood Site Visit Question	Will a layout of the equipment on the site be provided by NorthWestern?	No. Site-specific layouts are requested of the Bidders. The supplier recommended layouts were included in RFP Addendum 1.	
67	Lockwood Site Visit Question	Are multiple engine halls required?	No. The OEM layouts provided in RFP Addendum 1 are simply OEM recommendations based on their typical scope of supply and Bidders shall propose an arrangement to optimize project cost, operability, and maintainability.	
68	Lockwood Site Visit Question	Is Lockwood its own municipality?	Lockwood is a census designated place (CDP) and a suburb of Billings and is located in Yelkowstone County.	
69	Lockwood Site Visit Question	Will a storage bid be a non-conforming EPC bid?	No. NorthWestern will consider alternate technologies as indicated in the RFP document.	
70	Lockwood Site Visit Question	Will a storage project just be used for energy arbitrage?	No. A storage project will be used in a manner to optimize NorthWestern system operations and will provide multiple system services.	
71	Lockwood Site Visit Question	Can bidders price just one of the two OEMs (rather than both)?	Since NorthWestern is still evaluating both OEMs, NorthWestern requests that both options be priced.	
72		Who will be responsible for obtaining any required construction laydown area near the Lockwood site?	This will be Contractor's responsibility. NorthWestern may assist in identifying potential areas.	

Question No.	RFP / Specification Section Number	Question	Response	Additional Notes
93	RFP Appendix B - TS B2	Has there been any progress on the second Billings site? Bidder would prefer not to spend a lot of engineering time on the Lockwood site if it is no longer a consideration.	Information on the Billings EPC site will be provided in the next RFP addendum.	
94	Appendix 01 – Fuel Analysis of either TS Appendices B1 or B2	Can you please provide the fuel analysis referenced to be located in TS Appendices B1 or B2?	This information was provided to the EPC Bidders' primary point of contact on 2/14/20 as part of TS Appendices B1 and B2 as part of the initial RFP issuance (following submittal of the Notice of Intent to Respond Form).	
95	Appendix G-2 (PPA Term Sheet)	We are aware that ancillary service charges are the subject of settlement discussions currently in progress between NorthWestern and stakeholders, creating uncertainty as to the final approved ancillary service charges. Therefore, under a PPA structure for hybrid and storage projects, should bidders assume that that ancillary service charges are a pass-through and the PPA bid price is net of ancillary service charges?	This is an appropriate assumption. Bidders should assume that PPA pricing is net of ancillary service charges.	
96	Addenidum 1 TS Attachment 2.1 and 2.2	In regards to question 91, the optional scope additions that could be provided by OEM's were found in Addendum 1 TS Attachment 2.1_Specs and Technical Info in the scope of supply on pages 162-180 and in Addendum 1 TS Attachment 2.2_Specs and Technical Info pages in the scope of supply on pages 78-143.	See Section 2.2 of TS Attachment 1 (2023 Montana Generation RICE RFP/Specification 10183023-ZP-M0102) for tables that clarify the scope of supply by the OEM (Seller) and the EPC Contractor (Others). Furthermore, items required for a complete installation and to meet guaranteed performance as outlined in the RFP Appendix B Technical Specification (10183023-0ZP-M0102) are the responsibility of the EPC Contractor. To assist the Bidder in developing their Proposal, the following clarifications are provided:	TS Attach 2.1 Specs and Technical Info (OEM A) None of the "Customer" options ("O") options are being furnished by the OEM or the Owner, with further clarification offered below:  *Pages 164 & 174/230: Item 2.7 Heat Recovery System -Does not apply to the Project  *Page 166 & 176/230: Item 3.7 Black start Generator -Not required for the Project  *Page 170/230: Item 5.6 Urea Tank - Not required for the Project at Dave Gates site  TS Attach 2.2 Specs and Technical Info (OEM B) None of the Items indicated as "Responsibility of NorthWestern Energy" are being furnished by the OEM or the Owner, with further clarification offered below: *Pages 77-98/455: This is for the Billings dual fuel option and no longer applies *Page 106/455: Item A7.3 Black Start Unit - Not required for the Project  *Page 127/455: Item A5.2 Reducing agent storage tank -Not required for the Project at Dave Gates site  *Page 128/455: Item A7.3 Black Start Unit - Not required for the Project at Dave Gates site  *Page 128/455: Item A7.3 Black Start Unit - Not required for the Project at Dave Gates site
97		What is the estimated area required for laydown of OEM vendor materials? How many connexs and bulk materials are estimated to be delivered to the site?	This information has not been provided by the OEM Suppliers outside of some general information (this has already been provided to EPC Bidders, as applicable). EPC Contractor shall review the information provided as part of TS Attachments 2.1 and 2.2 and determine for their purposes. EPC Bidders are encouraged to reach out to the OEM contacts provided in RFP Addendum 3 to discuss laydown requirements, also.	
98	Section 48-1121 RICE Part 2.4.3	The Clean and Dirty Lube Oil Storage section references two tanks provided by NorthWestern Energy, one for clean and one for dirty lube oil storage. Please confirm that this statement is correct. Does this apply to only the Dave Gates site or both Dave Gates and Lockwood?	The note referenced is from the RICE RFP and is for the OEM Supplier. Section 15.6.1 of the RFP Appendix B Technical Specification identifies these two tanks as being within the EPC Contractor's scope of supply for both sites.	
99	Addendum 2 Appendix 8- Site Layout and Terminal point Drawing Lockwood	The site layout and terminal point drawing for the Lockwood site released in addendum 2 identified TP 2 and 3 to be located approximately 680 feet north along Klenck Ln. After review with the Lockwood Water and Sewer department, that location appears to be incorrect. As seen in the attached document, it appears TP 2 and 3 should be located along Cerise Rd.	Refer to updated Billings Area site information included in RFP Addendum 3.	
100	REP Section 9	What is NorthWestern Energy's expected cost (\$/kW-year) to procure capacity resources in the market for the period 2021 through 2023?	NorthWestern's expected near term capacity procurement costs are currently not defined and will depend on a number of factors including ongoing resource procurement activities.	
101		The RFP states that there is an incremental value to NWE for capacity coming on line during the period of 2021 through 2023. What is that incremental value in \$/kw-year?	Any incremental or detrimental value related to an earlier commercial online date/start of delivery date would be dependent upon and will be determined through system modeling of that specific resource in conjunction with NorthWestern's existing generation portfolio.	
102			A geotechnical analysis has not yet been completed but will be in the future. A geotechnical basis of design is included in the Technical Specifications and EPC Bidders should base their Proposals on this basis of design.	