

Charles E. Hansberry  
Jenny M. Jourdonnais  
HANSBERRY & JOURDONNAIS, PLLC  
2315 McDonald Avenue, Suite 210  
Missoula, MT 59801  
Telephone (406) 203-1730  
Telefax (406) 205-3170  
chuck@hjbusinesslaw.com  
jenny@hjbusinesslaw.com

Attorneys for Plaintiffs

Additional counsel of record listed on signature page of motion

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**PORTLAND GENERAL ELECTRIC  
COMPANY; AVISTA CORPORATION;  
PACIFICORP; and PUGET SOUND  
ENERGY, INC.,**

Plaintiffs,

v.

**NORTHWESTERN CORPORATION;  
TALEN MONTANA, LLC; and AUSTIN  
KNUDSEN, in his official capacity as  
Attorney General for the State of  
Montana,**

Defendants.

Case No. 1:21-cv-00047-SPW-KLD

**DECLARATION OF RONALD J.  
ROBERTS IN SUPPORT OF  
PLAINTIFFS' RESPONSE TO  
CITY OF COLSTRIP'S AMICUS  
BRIEF**

I, Ronald J. Roberts, make the following declaration pursuant to 28 U.S.C.

§ 1746 and under penalty of perjury:

1. I am Vice President, Energy Supply, for Puget Sound Energy, Inc. (“PSE”). I have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.

2. As part of PSE’s 2017 general rate case, PSE voluntarily secured \$10 million dollars from ratepayers and shareholders to create the Colstrip Community Fund to support community planning transition efforts. Attached as **Exhibit A** is a true and correct copy of a PSE press release dated September 15, 2017, which describes the settlement and the \$10 million contribution.

3. Attached as **Exhibit B** is a letter from PSE dated December 6, 2019, to Montana Governor Steve Bullock, Montana Attorney General Tim Fox, and Colstrip Mayor John Williams confirming that PSE had completed its commitment to contribute \$10 million dollars for the Colstrip Community Fund.

4. In June 2021, PSE entered into a 20-year power purchase agreement to buy clean energy from the planned Clearwater Wind Project, which is located north of Colstrip and will span Rosebud, Garfield, and Custer counties. The full project is expected to deliver substantial economic benefits to the region. Attached as **Exhibit C** is a true and correct copy of a PSE press release announcing the agreement.

I certify and attest that the foregoing statements made by me are true under penalty of perjury.

Dated this 15th day of April, 2022

  
\_\_\_\_\_  
Ronald J. Roberts

**CERTIFICATE OF SERVICE**

I certify that on this date, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

DATED: April 15, 2022.

*s/ Dallas DeLuca*

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Dallas DeLuca (admitted *Pro Hac Vice*)  
Attorneys for Plaintiff Portland General  
Electric Company

**CERTIFICATE OF SERVICE**