

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

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IN THE MATTER OF the Application of) REGULATORY DIVISION
MONTANA-DAKOTA UTILITIES CO.,)
A Division of MDU Resources Group,) DOCKET NO. D2012.9.100
Inc., for Authority to Establish Increased)
Rates for Natural Gas Service)

DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL

MCC-135 RE: DATA
WITNESS: ROBINSON

Please provide the original cost, by vintage, by account as reflected in Section 9 of the depreciation study, on electronic medium in Excel readable format for each account separately.

MCC-136 RE: SPR
WITNESS: ROBINSON

Please provide the output of each separate SPR analysis whether relied upon or not, by account.

MCC-137 RE: DATA
WITNESS: ROBINSON

Please provide all life and net salvage input data, both before adjustment or modification and after adjustment or modification, on electronic medium in Excel readable format by account.

MCC-138 RE: NET SALVAGE
WITNESS: ROBINSON

Please provide all values set forth in Section 7 of the depreciation study as it relates to net salvage, by account, on electronic medium in Excel readable format.

MCC-139 RE: NET SALVAGE
WITNESS: ROBINSON

Please provide a detailed narrative explaining how the average retirement age is determined in the net salvage analysis for each account, given the Company does not maintain age data for its plant in service and has run SPR analysis rather than actuarial analysis for life purposes. Further, provide the average retirement age calculation for each account on electronic medium in Excel readable format.

MCC-140 RE: NET SALVAGE
WITNESS: ROBINSON

Please identify the dollar amount of cost of removal incurred, by account, for accounts 376 and 380 by year for the past 10 years associated with emergency retirement activity.

MCC-141 RE: ACCOUNT 376
WITNESS: ROBINSON

Please identify the linear feet of mains retired, by size of main, by year for the past 10 years. The information should be provided on electronic medium in Excel readable format.

MCC-142 RE: ACCOUNT 3780
WITNESS: ROBINSON

Please identify the number of services retired by year for the past 10 years. The information should be provided on electronic medium in Excel readable format.

MCC-143 RE: NET SALVAGE
WITNESS: ROBINSON

Please provide a detailed narrative explaining specifically how annual inflation built into forecasted net salvage amounts was employed in the development of the final proposed net salvage parameters for accounts 376 and 380.

MCC-144 RE: NET SALVAGE
WITNESS: ROBINSON

To the extent future inflation influenced the determination of the proposed net salvage value, please explain why future inflation was not discounted back to a net present value

level so that current customers would not be paying with current dollars for future inflated costs. Further, provide all support for such position.

MCC-145 RE: DATA
WITNESS: ROBINSON

Please provide all net salvage and life-related workpapers. All workpapers should be provided on electronic medium in Excel readable format.

MCC-146 RE: NET SALVAGE
WITNESS: ROBINSON

Please identify the number of services and linear feet of mains retired by year for the past 10 years that were not associated with replacement activity.

MCC-147 RE: NET SALVAGE
WITNESS: ROBINSON

When replacement activity occurs and costs are incurred, please provide the allocation of costs between cost of removal and cost of the new installation by activity by account for accounts 376 and 380, by year, for the past 10 years. Further, for each allocation factor employed, provide the actual percentage for each activity or the level at which the percentage allocated or is employed, along with all underlying support, studies, analyses, documentation, etc. associated with the development of the allocation factor.

MCC-148 RE: ACCOUNT 390 COMMON
WITNESS: ROBINSON

Please provide a detailed description (e.g., physical location, type of construction, square feet, when built, etc.) for each of the 10 largest investments in Account 390 – General Structures Common Plant. For each of the 10 largest investments, identify whether the investment is owned or leased.

MCC-149 RE: ACCOUNT 390 COMMON
WITNESS: ROBINSON

Please identify each time in the last 20 years when the Company retired one of its general office structure in Account 390 Common Plant, or terminated a lease and moved to a new location. For each such instance, identify the dollar level of retirements, a description of what was retired, along with corresponding cost of removal and net salvage.

MCC-150 RE: ACCOUNT 376
WITNESS: ROBINSON

Please provide a detailed narrative explaining specifically how the 47R4 life-curve combination was selected for Accounts 376.1 and 376.2 – Mains Steel and Plastic, respectively. To the extent SPR results were relied upon, provide all ranking criteria for selected curves, as well as full justification for which band analysis was relied upon, and why the results of other bands were not relied on.

MCC-151 RE: ACCOUNT 380

Please provide a detailed narrative explaining specifically how the 40R3 life-curve combination was selected for Account 380 – Services. To the extent SPR results were relied upon, provide all ranking criteria for selected curves, as well as full justification for which band analysis was relied upon and why the results of other bands were not relied on.

MCC-152 RE: DATA
WITNESS: ROBINSON

Please provide all industry data associated with life and net salvage parameters for investments in Accounts 376 – Distribution Mains, and 380 – Distribution Services, in the possession of either the Company or its depreciation consultant.

MCC-153 RE: ACCOUNT 376
WITNESS: ROBINSON

Please identify all utilities that either the Company or its depreciation consultant are aware of that have life estimates for Account 376 – Distribution Mains greater than 47 years. Further, provide supporting documentation.

MCC-154 RE: ACCOUNT 380
WITNESS: ROBINSON

Please identify all utilities that either the Company or its depreciation consultant are aware of that have life estimates for Account 380 – Distribution Services greater than 40 years. Further, provide supporting documentation.

MCC-155 RE: ACCOUNT 376
WITNESS: ROBINSON

Please segregate the investment in Account 376.2 – Distribution Plastic Mains into early generation versus each later generation of plastic pipe. Further, specifically identify each separate generation of plastic pipe installed along with the corresponding dollar values and when each prior generation of pipe was no longer installed.

MCC-156 RE: ACCOUNT 376
WITNESS: ROBINSON

Please segregate the investment in Account 376.1 – Distribution Steel Mains between bare steel, coated steel, and wrapped steel, as well as when each type of investment was first installed in the system and when the Company no longer installed such type of main.

MCC-157 RE: ACCOUNT 376
WITNESS: ROBINSON

Please identify the dollar level of retirements, by year, associated with Account 376.1 – Distribution Steel Mains by type of pipe (i.e., bare, wrapped, coated, etc.). The information should be provided on electronic medium in Excel readable format.

MCC-158 RE: ACCOUNT 380.2
WITNESS: ROBINSON

Please segregate the investment in Account 380.2 – Distribution Plastic Services into early generation versus each later generation of plastic pipe. Further, specifically identify each separate generation of plastic pipe installed along with the corresponding dollar values and when each of prior generation of pipe was no longer installed.

MCC-159 RE: ACCOUNT 380.1
WITNESS: ROBINSON

Please segregate the investment in Account 380.1 – Distribution Steel Services between bare steel, coated steel, and wrapped steel, as well as when each type of investment was first installed in the system and when the Company no longer installed such type of main.

MCC-160 RE: ACCOUNT 380.1

Please identify the dollar level of retirements, by year, associated with Account 380.1 – Distribution Steel Services by type of pipe (i.e., bare, wrapped, coated, etc.). The information should be provided on electronic medium in Excel readable format.

MCC-161 RE: DATA
WITNESS: ROBINSON

Please provide a copy of each of Mr. Robinson's gas-related depreciation studies, including all testimony and exhibits submitted during the past five years.