

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

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

**MONTANA-DAKOTA UTILITIES CO. DATA REQUESTS TO
THE MONTANA CONSUMER COUNSEL**

MDU-001 Re: Embedded Class Cost of Service Study
Witness – Donkin

Please provide an electronic copy of Exhibit ___(GLD-1).

MDU-002 Re: Revenue Requirement
Witness – Clark

Please provide an electronic copy of Exhibit ___(AEC-1), (AEC-2), (AEC-3) and (AEC-4).

MDU-003 Re: Depreciation
Witness – Pous

For the most recent five year period, please provide:

- a) A listing of gas distribution companies for which Mr. Pous has investigated depreciation rates, parameters (ASL/Curve and Net Salvage Factors, etc. and/or developed alternative depreciation proposal.
- b) The jurisdiction, case number, and other pertinent information.
- c) A copy of the depreciation parameter and expense summary table.

MDU-004 Re: Depreciation
Witness – Pous

Relative to Account 376-Distribution Mains, within each of the cases listed in MDU-003, please provide the company's original depreciation parameter proposal, Diversified Utility Consultants (DUC) alternate proposal, and the final settled or adjudicated resulting parameters (provide a notation whether the final result was a settlement or an adjudicated finding).

MDU-005 Re: Depreciation
Witness – Pous

Relative to Account 380-Services, within each of the cases listed in MDU-003, please provide the company's original depreciation parameter proposal, Diversified Utility Consultants (DUC) alternate proposal, and the final settled or adjudicated resulting parameters (provide a notation whether the final result was a settlement or an adjudicated finding).

MDU-006 Re: Depreciation
Witness – Pous

Relative to Account 381-Meters, within each of the cases listed in MDU-003, please provide the company's original depreciation parameter proposal, Diversified Utility Consultants (DUC) alternate proposal, and the final settled or adjudicated resulting parameters (provide a notation whether the final result was a settlement or an adjudicated finding).

MDU-007 Re: Depreciation
Witness – Pous

Relative to Account 390-Structures & Improvements, within each of the cases listed in MDU-003, please provide the company's original depreciation parameter proposal, Diversified Utility Consultants (DUC) alternate proposal, and the final settled or adjudicated resulting parameters (provide a notation whether the final result was a settlement or an adjudicated finding).

MDU-008 Re: Depreciation
Witness – Pous

For the most recent five year period, please provide:

- a) A listing of gas distribution companies for which Mr. Pous has completed a comprehensive depreciation study (as opposed to reviewing an existing depreciation study).
- b) A copy of all reports related to any such depreciation studies.

MDU-009 Re: Depreciation
Witness – Pous

With regard to DUC's alternative depreciation proposals, please provide a specific reference to all Company provided source records utilized to arrive at the resulting recommendations.

MDU-010 Re: Depreciation
Witness – Pous

For Account 376.2 Distribution Mains-Plastic contained on page 24 of Mr. Pous' testimony, please provide:

- a) The historical data used to create the curve plot.
- b) The underlying Observed Life Table and applicable retirement and experience bands for the plotted raw data points.
- c) An explanation of the P:70 E:70 designations contained on the bottom of the charts.

MDU-011 Re: Depreciation
Witness – Pous

For Account 376.1 Distribution Mains-Steel contained on page 27 of Mr. Pous' testimony, please provide:

- a) The historical data used to create the curve plot.
- b) The underlying Observed Life Table and applicable retirement and experience bands for the plotted raw data points.

MDU-012 Re: Depreciation
Witness – Pous

Please provide a copy of any workpapers and/or supporting data that was utilized in the process of developing Mr. Pous' testimony and exhibits that were filed in conjunction with Mr. Pous' testimony.

MDU-013 RE: Analysts Growth Expectations
Witness – Wilson, Page 12

Please provide any empirical data which supports Dr. Wilson's statement that "analysts' forecasts are somewhat more bullish than investors' actual expectations."

MDU-014 RE: Dinson, March and Staunton Publication
Witness – Wilson, Page 24, Lines 13-15

Please provide a complete copy of the Dinson, March and Staunton publication cited in Lines 13-15 of Page 24.

MDU-015 RE: Fama and French Publication
Witness – Wilson, Page 25, Lines 14-17

Please provide a complete copy of the E. F. Fama and K. R. French publication cited in Lines 14-17 of Page 25.

MDU-016 RE: Welch Publication
Witness – Wilson, Page 26, Lines 4-6

Please provide a complete copy of the Ivo Welch publication cited in Lines 4-6 of Page 26.

MDU-017 RE: CAPM Cost of Equity Estimate
Witness – Wilson, Page 26, Line 10

Please reconcile the CAPM cost of equity estimate presented in Line 10 of Page 26 (*i.e.* 8.285%) with the CAPM cost of common equity return indicator presented in Exhibit___(JWW-8) (*i.e.* 6.28%).

MDU-018 RE: Earnings Growth Model
Witness – Wilson, Exhibit___(JWW-1)

Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-1).

MDU-019 RE: Dividend Growth Model
Witness – Wilson, Exhibit___(JWW-2)

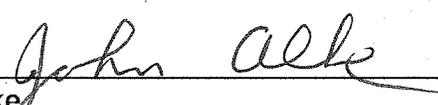
Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-2).

- MDU-020 RE: Book Value Growth Model
Witness – Wilson, Exhibit___(JWW-3)
- Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-3).
- MDU-021 RE: Fundamental Growth Model
Witness – Wilson, Exhibit___(JWW-4)
- Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-4).
- MDU-022 RE: Capital Asset Pricing Model
Witness – Wilson, Exhibit___(JWW-5)
- Please provide a copy of the source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-5).
- MDU-023 RE: Comparable Expected Market Earnings Rates
Witness – Wilson, Exhibit___(JWW-6)
- Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-6).
- MDU-024 RE: Comparative Risk Indicators
Witness – Wilson, Exhibit___(JWW-7)
- Please provide a copy of the cited sources and source data, including any electronic spreadsheets, used to prepare Exhibit___(JWW-7).
- MDU-025 RE: Indicated Range of Reasonableness
Witness – Wilson, Exhibit___(JWW-8)
- Please explain how the indicated range of reasonableness of 7% to 9% was established with specific references to the cost of common equity return indicators presented in Exhibit___(JWW-8).

DATED this 11th day of March 2013.

HUGHES, KELLNER, SULLIVAN & ALKE, PLLP

By



John Alke

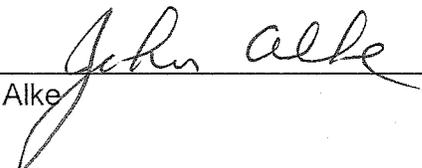
40 W. Lawrence, Suite A
P.O. Box 1166
Helena, MT 59624-1166

Attorneys for Montana-Dakota Utilities

CERTIFICATE OF SERVICE BY MAIL

I HEREBY CERTIFY that a copy of the foregoing **MONTANA-DAKOTA UTILITIES CO. DATA REQUESTS TO THE MONTANA CONSUMER COUNSEL** was served upon the following by mailing a true and correct copy thereof on this 11th day of March 2013, addressed as follows:

**MONTANA CONSUMER COUNSEL
PO BOX 201703
HELENA MT 59620-1703**



John Alke