

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

IN THE MATTER OF THE APPLICATION OF)
MONTANA-DAKOTA UTILITIES CO., a) REGULATORY DIVISION
Division of MDU Resources Group, Inc., for)
Authority to Establish Increased Rates for Electric) DOCKET NO. D2015.6.51
Service in the State of Montana)

**MONTANA LARGE CUSTOMER GROUP'S FIRST SET OF
DATA REQUESTS TO MONTANA-DAKOTA UTILITIES CO.**

The Montana Large Customer Group ("LCG"), by and through its undersigned counsel, pursuant to applicable rules of procedure, submits the attached Data Requests to the Montana-Dakota Utilities Co. ("MDU"). The following response date, definitions and instructions apply to the attached Data Requests:

RESPONSE DATE, DEFINITIONS AND INSTRUCTIONS

Please respond to these Date Requests within fourteen (14) calendar days, *i.e.*, by September 30, 2015.

DEFINITIONS

1. "Montana-Dakota Utilities Co.," "MDU," "Company," "Applicant," or "you" shall mean Montana-Dakota Utilities Co.; any merged or consolidated predecessor or predecessors in interest; parent(s), subsidiaries and affiliates, past and present; and the employees, officers, directors, agents, consultants, attorneys and all persons acting under contractual arrangement with or acting or purporting to act on behalf of Applicant.
2. "Document" and "documentation" should be interpreted as broadly as possible to include, but not be limited to, the original or any copy, regardless of origin or location, of any book, pamphlet, periodical publication, letter, scrapbook, diary, calendar, canceled check, photograph, form, memorandum, schedule, tax return, telegram, telex, report, record, order or notice of governmental action of any kind, study, minutes, logs, graph, index, tape, disc, internal operating manual, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, graphic or retrievable matter or data of any kind, however produced or reproduced, to which you have or have had access. This definition is intended to include, but not be limited to, all documents which have been created and/or which reside in any type of electronic format.

Any document that is not exactly identical to another document for any reason, including, but not limited to, marginal notations or deletions, should be considered to be a separate document.

As to any document related to the matters addressed herein that is not currently in your possession but that you know or believe such a document exists, you are requested to identify and indicate to the best of your ability its present or last known location or custodian.

3. “Person or Entity” should be interpreted to denote, unless otherwise specified, any natural person, firm, corporation, association, group, individual or organization of any type whatsoever.
4. Any request to “identify” or “provide” should be interpreted to mean:
 - a. With respect to a natural person, that person’s full name, title, job description, and business and home address. Where the identification pertains to a past period, as to each person identified who is still in your employ, or the employment of the group with which such person is identified in response to any requests, provided, in addition, that person’s title and job description as of the time of such past period. Where the person is no longer in your employ or the employment of the group with which such person is identified in response to any request, provide that person’s affiliate, position, home and business address, if known, or if not known, such person’s last known affiliation, position, home and business address, or portions thereof as may be known.
 - b. With respect to an entity other than a natural person, that entity’s name, business, type of entity, present status and present or last known address.
 - c. With respect to a document, that document’s title, date, author (and, if different, the signer), addresses, recipients, or other persons who assisted in the preparation, subject matter or general nature, and any amendments thereto, present location and custodian, whether or not such document is in the respondent’s possession, custody or control and whether or not the document is claimed to be privileged. The final version and each draft of each document should be identified and produced separately. Each original and each non-identical copy (bearing marks or notations not found on the original) of each final version and draft of each document should be identified and produced separately.
 - d. With respect to a physical facility, the location of the facility, the intended purpose of the facility, the actual use of such facility, the operating dates of the facility, the installation date of the facility, the date utilization of the facility terminated if applicable, and whether the facility is subject to the jurisdiction of the Public Service Commission of Montana, the Federal Energy Regulatory Commission, or any other regulatory body.
5. “Communication” should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial, electronic or otherwise, including testimony or sworn statement, or any means or type whatsoever.

6. “Relating To” or “Related To” means pertaining to, presenting, discussing, commenting on, analyzing, or mentioning in any way.

GENERAL INSTRUCTIONS

1. Where a request can be answered in whole or in part by reference to the response to a preceding or subsequent request, it is sufficient to so indicate by specifying the response to the preceding or subsequent request by number and specifying whether it is claimed that the response to the preceding or subsequent request is a full or partial response. If the latter, the response to the balance of the request shall be completed.
2. If various individuals are the authors of different responses to the Data Requests, please indicate the name of the author and his/her position within Applicants, or if he/she is an expert or a consultant, please provide a current curriculum vitae for each such expert of consultant.
3. As to any requests consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate request. Should objection to a request be interposed it should clearly indicate to which part or portion of the request it is directed.
4. For each document identified in a response which is computer generated, state separately (a) what types of data files or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (punch cards, tapes, etc.), (c) a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person or persons, during the designed period, who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and/or the programming to obtain such output.
5. Responses to requests referring to documents shall include all documents relating to the time period specified in each request or in these instructions, whether prepared before, during or after that period.
6. Individual response of more than one page should be stapled or bound, and each page consecutively numbered.
7. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - a. the reasons for withholding;
 - b. date of the document;
 - c. name of each author or preparer;
 - d. name of each person who received the document; and
 - e. statement of facts constituting the basis for withholding the document.

8. If you assert that documents, records, or information responsive to any requests have been destroyed and are thus not available, state when and explain why any such document, record or information was destroyed, identify the person directing the destruction and identify all documents relevant to such destruction or explanation. If a claim is made that the destruction occurred pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program, and any correspondence or communication relating to the destruction of responsive documents, records or information.
9. If any of these requests are not answered on the ground that the material or information requested is confidential, privileged or otherwise immune to discovery, set forth in detail the factual and legal basis which support your decision to withhold production. Please also state whether a protective order or protective conditions regarding disclosure would satisfy or resolve your concern.
10. Each document or written response shall designate the respective question (and subpart of the question) under which it is being produced.
11. Each document produced shall be an authentic original document or a true duplicate of an authentic original document.
12. Each of these requests shall be considered to be continuing and to require supplemental or amended answers as readily as information and knowledge is acquired.
13. If, in answering a request, you encounter any ambiguity in interpreting either the request or a definition or instruction applicable thereto, please secure a clarification by contacting undersigned counsel as soon as the ambiguity is known.
14. The term “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request any information or document which might otherwise be considered to be beyond its scope.
15. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate in order to bring within the scope of each request.

Respectfully submitted this 16th day of September, 2015.

MONTANA LARGE CUSTOMER GROUP

s/ Thorvald A. Nelson

Thorvald Nelson, # 8666

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DATA REQUESTS

LCG-001 RE: MDU's Workpapers

To the extent not otherwise provided in the Company's response to Montana Public Service Commission data request PSC-001, please provide all workpapers utilized in the preparation of the Company's filing in this case, in Excel format where applicable, with all formulas and links intact.

LCG-002 RE: MDU's Revenue Requirement

To the extent not otherwise provided in the Company's response to Montana Public Service Commission data request PSC-001, please provide a working copy of the Company's revenue requirement model(s) and all supporting workpapers in Excel format with all formulas intact. If there is any supporting documentation on the use/operation of these models, please include the documentation with this response.

LCG-003 RE: Updated Information (as applicable)

To the extent the Company files corrections, revisions, amendments, supplemental information and/or errata to its originally filed case, please provide all updated materials including the Company's testimony, exhibits, workpapers and models in an electronic format with working formulas included where applicable

LCG-004 RE: Cost of Service
Witness: Cardwell/Aberle

Please provide any prior Commission Orders supporting the use of the results of both an embedded class cost of service study and a marginal cost of service study.

LCG-005 RE: Cost of Service
Witness: Cardwell/Aberle

Please explain how the Company uses the results of its embedded cost of service study and its marginal cost of service study to specifically develop the proposed increases for each rate class. How does the Company weight these two studies in this determination (class rate increases)?

LCG-006 Regarding: Cost of Service
 Witness: Cardwell

Please provide any prior Commission Orders adopting the use of an AED methodology to allocate costs in an embedded class cost of service study.

LCG-007 Regarding: Cost of Service
 Witness: Cardwell

Please identify the production demand allocation methodology used by MDU in any of its other jurisdictions during the past 5 years in a class cost of service study. Provide the case or docket number, the jurisdiction and copies of any supporting MDU testimony.

LCG-008 Regarding: Cost of Service
 Witness: Cardwell

Please provide all studies and other workpapers supporting the development of the allocation factors for the embedded class cost of service study.

LCG-009 Regarding: Cost of Service
 Witness: Cardwell

If not provided in the previous request, please provide the load research studies supporting the development of the values in Column E, "Load Factor (%)" of the tab "demand and energy-AED" of the spreadsheet "Statement L.xlsm". Include any electronic files supporting the development of the load factors by rate class.

LCG-010 Regarding: Cost of Service
 Witness: Cardwell

Please provide, for each rate class included in the class cost of service study, the 12 class coincident peak for each month of the test year, along with all supporting load research studies/data and electronic files and workpapers. Please provide these 12 CP demands at both the meter level and the supply level for each rate class. To the extent that there are multiple metered voltages within a rate class, please provide the requested information by service voltage and rate class.

LCG-011 Regarding: Cost of Service
 Witness: Cardwell

Please provide the kWh by rate class on a monthly basis for the test year, for both the Per Books and Pro Forma basis.

LCG-012 Regarding: Cost of Service
 Witness: Cardwell

Please provide all studies and other workpapers supporting the demand and energy loss factors used in developing the allocation factors for the embedded class cost of service study.

LCG-013 Regarding: Cost of Service
 Witness: Cardwell

Please provide all supporting calculations, workpapers, and other documents for the Capacity Credit percentages used in developing Factor 3 for the embedded class cost of service study.

LCG-014 Regarding: Cost of Service
 Witness: Cardwell

Please reconcile the statement from the testimony of Sara J. Cardwell, page 5, lines 1 through 5 that the wind facilities allocation factor is weighted “20% on the AED allocator” with the calculation of Factor 3 in “Statement L.xlsm”, tab “Allocation Factors” which uses a weight of 16.5%.

LCG-015 Regarding: Cost of Service
 Witness: Cardwell

Please provide citations to any Montana PSC orders which support the Company’s methodology for the allocation of wind facilities.

LCG-016 Regarding: Cost of Service
 Witness: Cardwell

Please provide citations to any Montana PSC orders or other documents relied upon by the Company to support the methodologies of either the embedded and marginal cost of service studies.

CERTIFICATE OF SERVICE

I hereby certify that on this, the 16th day of September, 2015, the **MONTANA LARGE CUSTOMER GROUP'S FIRST SET OF DATA REQUESTS TO MONTANA-DAKOTA UTILITIES CO.** was e-filed with the Commission and served via U.S. mail and e-mail, unless otherwise noted, to the following:

<p>Kate Whitney Montana PSC 1701 Prospect Avenue PO Box 202601 Helena, MT 59620-2601 kwhitney@mt.gov via UPS on 9/17/15</p>	<p>Robert Nelson Monica Tranel Montana Consumer Counsel 111 N. Last Chance Gulch P.O. Box 201703 Helena, MT 59620 robnelson@mt.gov mtranel@mt.gov</p>
<p>Tamie A. Aberle Director of Regulatory Affairs Montana-Dakota Utilities Co. 400 North Fourth Street Bismarck, ND 58501 tamie.aberle@mdu.com</p>	<p>Michael Green Crowley Fleck PLLP 900 N. Last Chance Gulch, Suite 200 Helena, MT 59601 mgreen@crowleyfleck.com</p>
<p>Thorvald A. Nelson Holland & Hart, LLP 6380 South Fiddler's Green Circle Suite 500 Greenwood Village, CO 80111 tnelson@hollandhart.com</p>	<p>Nikolas S. Stoffel Holland & Hart, LLP 6380 South Fiddler's Green Circle Suite 500 Greenwood Village, CO 80111 nsstoffel@hollandhart.com</p>
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s/ Adele C. Lee _____

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