

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 SECOND 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 Montana-Dakota Utilities Co. ("MDU"). The following response date, definitions and instructions apply to the attached Data Requests:

RESPONSE DATE, DEFINITIONS AND INSTRUCTIONS

Responses to these Date Requests are due within 14 calendar days, *i.e.*, by October 15, 2015. Please refer to the Definitions and Instructions included in LCG's First Set of Data Requests to MDU in this proceeding.

Respectfully submitted this 1st day of October, 2015.

MONTANA LARGE CUSTOMER GROUP

s/ Thorvald A. Nelson

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DATA REQUESTS

LCG-017 RE: Revenue Requirement Model

Please provide a functional electronic copy of the model used to allocate Total Company costs to the Montana jurisdiction that supports the derivation of the revenue deficiency shown in Rule 38.5.175, p. 8 of 8.

LCG-018 RE: Jurisdictional Allocation Factors

Please provide all workpapers in electronic format, preferably in Excel with formulas intact, supporting the development of the Montana jurisdictional allocation factors applied to total company costs for calendar years 2014 and 2015.

LCG-019 RE: Fuel and Purchased Power

Please provide a monthly summary (both dollars and kWhs) in electronic format, preferably in Excel with formulas intact, of the 2014 actual fuel and purchased power costs and KWh summarized in MDU's Workpapers re Statements A-O.pdf, p. G-35.

LCG-020 RE: Fuel and Purchased Power

- a. Please define "Acct." as used in MDU's Workpapers re Statements A-O.pdf, p. G-35. Specifically clarify if the "Acct." column refers to "actual" or some adjusted amount.
- b. Please confirm that the "Acct." columns in MDU's Workpapers re Statements A-O.pdf, p. G-35 do not reflect the output required to serve weather-normalized 2014 system loads. If not confirmed, please explain the specific characteristics of the underlying system loads associated with the output in the "Acct." column.

LCG-021 RE: Fuel and Purchased Power

Please provide a monthly summary (both dollars and kWhs) in electronic format, preferably in Excel with formulas intact, of the 2014 pro forma fuel and purchased power costs and kWh summarized in MDU's Workpapers re Statements A-O.pdf, p. G-35.

LCG-022 RE: Fuel and Purchased Power

Please confirm that the pro forma 2014 fuel and purchased power costs and kWh summarized in MDU's Workpapers re Statements A-O.pdf, p. G-35 reflect weather-normalized system loads. Which year's pro forma loads are being reflected – 2014 or 2015? If not confirmed, please

explain please explain the specific characteristics of the underlying system loads associated with the output in the “Pro-Forma” column.

LCG-023 RE: New Large Generation Projects

For each of the new large generation projects listed below, please provide the exact actual or anticipated post-testing commercial in-service date for the project.

- a. AQCS Project – Big Stone Station.
- b. MATS Compliance – Lewis & Clark.
- c. RICE Units – Lewis & Clark.
- d. Thunder Spirit Wind Farm.

LCG-024 RE: Fuel and Purchased Power

Please confirm that the pro forma 2014 fuel and purchased power summarized in MDU’s Workpapers re Statements A-O.pdf, p. G-35 model the new large generation projects as being available during the entire pro forma period. If not confirmed, please explain how each of the new large generation projects is modeled during the pro forma period.

LCG-025 RE: Fuel and Purchased Power

Please prepare a pro forma 2014 fuel and purchase power report using the exact in-service dates provided in the response to the question #7 above. Please provide a monthly summary (both dollars and kWhs) in electronic format, preferably Excel, with formulas intact.

LCG-026 RE: New Large Generation Projects

Please refer to MDU Adjustment No. 12 – Subcontract Labor. Does this adjustment include any costs associated with the four new large generation projects? If so, please identify the Total Company and Montana dollar amount included in this adjustment separately for each of the four new large generation projects.

LCG-027 RE: New Large Generation Projects

Please refer to MDU Adjustment No. 14 – Materials. Does this adjustment include any costs associated with the four new large generation projects? If so, please identify the Total Company and Montana dollar amount included in this adjustment separately for each of the four new large generation projects.

LCG-028 RE: New Large Generation Projects

Regarding the Big Stone Station AQCS project:

- a. Please identify the location of each rate base adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that rate base item.
- b. Please identify the location of each expense adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that expense item.
- c. If there are any adjustments for this project that is not captured in part a) and b) above, please identify the item and please provide a schedule showing the Total Company and Montana monthly amount included for that item.

LCG-029 RE: New Large Generation Projects

Regarding the Lewis & Clark MATS project:

- a. Please identify the location of each rate base adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that rate base item.
- b. Please identify the location of each expense adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that expense item.
- c. If there are any adjustments for this project that is not captured in part a) and b) above, please identify the item and please provide a schedule showing the Total Company and Montana monthly amount included for that item.

LCG-030 RE: New Large Generation Projects

Regarding the Lewis & Clark RICE Units project:

- a. Please identify the location of each rate base adjustment within MDU's rate filing related to this project. For each item, please provide a schedule

showing the Total Company and Montana monthly amount included for that rate base item.

- b. Please identify the location of each expense adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that expense item.
- c. If there are any adjustments for this project that is not captured in part a) and b) above, please identify the item and please provide a schedule showing the Total Company and Montana monthly amount included for that item.

LCG-031 RE: New Large Generation Projects

Regarding the Thunder Spirit Wind Farm project:

- a. Please identify the location of each rate base adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that rate base item.
- b. Please identify the location of each expense adjustment within MDU's rate filing related to this project. For each item, please provide a schedule showing the Total Company and Montana monthly amount included for that expense item.
- c. If there are any adjustments for this project that is not captured in part a) and b) above, please identify the item and please provide a schedule showing the Total Company and Montana monthly amount included for that item.

LCG-032 RE: Load Forecast

Please refer to Exhibit No. DJN1 Demand and Energy 1985 to 2014.

- a. Please provide the projected peak customer load and annual energy requirements for both Montana and the integrated system for 2015 in the same format as the aforementioned exhibit. Please provide this information in Excel format with any formulas intact.
- b. Given that MDU has forecasted the peak customer load and energy requirements for 2015 and beyond in its IRP, please explain why this forecasted load information has not been incorporated into the pro forma revenue calculation in the rate case.

LCG-033 RE: Sales and Energy Forecast

Please refer to Rule 38.5.164, p. 5 of 8.

- a. Please modify this schedule to reflect the Montana forecasts billing determinants for the calendar year 2015, consistent with the most recent load forecast (i.e. the 2015 IRP or more recent, if available). Please provide this information in Excel format with formulas intact.
- b. Please explain the discrepancy of nearly 40 million kWh between Montana's total kWh consumption provided in the 2014 pro forma forecast in the referenced exhibit and Montana's total kWh consumption forecasted in MDU's 2015 IRP. Why were 2015 IRP load projections (or more recent, if available) not incorporated in this rate case?
- c. Has MDU modified its Montana 2014 test period pro forma sales and energy forecast since filing its case? If so, please provide the updated information.
- d. Please provide MDU's monthly actual kWh sales and revenues for Montana by rate schedule for 2014 and year-to-date 2015.

LCG-034 RE: MDU Statement Workpapers

Please refer to MDU's Workpapers re Statements A-O.pdf. Please provide a copy of these workpapers in their original native format (i.e. non-PDF).

LCG-035 RE: Fuel and Purchase Power

Please provide the Montana Large Customer Group a working copy of the model used to derive MDU's pro forma fuel and purchase power expense. Please include any manuals, instructions, passwords, etc. associated with operating this model.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of October, 2015, the **MONTANA LARGE CUSTOMER GROUP'S SECOND 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:

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s/ Adele C. Lee _____

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