

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 THIRD 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").

RESPONSE DATE, DEFINITIONS AND INSTRUCTIONS

Responses to these Date Requests are due within 14 calendar days, *i.e.*, by October 23, 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 9th day of October, 2015.

MONTANA LARGE CUSTOMER GROUP

s/ Nikolas S. Stoffel
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DATA REQUESTS

LCG-036 RE: MDU Employee Count

In Excel format, please provide MDU's actual full time equivalent ("FTE") employee count by month, beginning in January 2012 and continuing through the most recent date available.

LCG-037 RE: MDU Employee Start Date/Adjustment No. 7

For each Adjustment No. 7 employee listed in workpaper G-56 with a start date of Q3 2015, please provide the actual employment start date. If the employee has not yet commenced work, please provide an updated start date.

LCG-038 RE: Adjustment No. 8 Employees:

- a. Please provide the number of FTE employees represented by Adjustment No. 8.
- b. In Excel format, beginning in the first month when employees were in place at Heskett III and continuing monthly through the most recent date available, please provide the actual number of FTE employees in place at Heskett III.

LCG-039 RE: Adjustment No. 9 Employees

Please refer to workpaper G-57. Please confirm that the employees listed under L&C: Mechanic Welder and 2 Operators, refer to employees represented by Adjustment No. 9.

LCG-040 RE: Adjustment No. 9 Employees

- a. Please provide the number of FTE employees represented by Adjustment No. 9.
- b. Are there any Lewis & Clark RICE Unit and MATS employees yet in place? If so, in Excel format, beginning in the first month when Lewis & Clark RICE Unit and MATS employees were in place and continuing monthly through the most recent date available, please provide the actual number of FTE Lewis & Clark RICE Unit and MATS employees in place.

LCG-041 RE: MDU Employees and Thunder Spirit

Are there any employees yet in place at Thunder Spirit? If so, in Excel format, beginning in the first month when Thunder Spirit employees were in place and continuing monthly through the

most recent date available, please provide the actual number of FTE employees in place at Thunder Spirit.

LCG-042 RE: MDU Employees and Big Stone AQCS

Has the Company made any pro forma adjustments associated with additional employees for the Big Stone AQCS? If so, please cite to these adjustments in the Company's filing and provide the number of FTE employees represented by each adjustment.

LCG-043 RE: Fuel and Purchased Power

With the exception of Adjustments 7 through 10, please identify each pro forma adjustment proposed by MDU that is related an addition or reduction to employment levels relative to the historical 2014 test year. Please provide the number of FTE employees represented by each adjustment.

LCG-044 RE: Major Overhaul of MDU Facilities/MCC-036

Please refer to the Company's response to MCC Data Request 36.

- a. For each year 2007 through 2014 listed in this response, please provide the actual major overhaul expenses incurred for each applicable generation unit, by FERC account, on a Total Company and Montana jurisdictional basis, in Excel format with formulas intact.
- b. For 2015, please provide the actual major overhaul expense incurred to-date for Big Stone and Lewis & Clark, separately, by FERC account, on a Total Company and Montana jurisdictional basis, in Excel format with formulas intact.
- c. For 2015, please provide the most recent estimate of 2015 major overhaul expense for Big Stone and Lewis & Clark, separately, by FERC account, on a Total Company and Montana jurisdictional basis, in Excel format with formulas intact.

LCG-045 RE: Major Overhaul of MDU Generation Units

For each applicable generation unit, please provide the major overhaul expense included in the Company's proposed revenue requirement by FERC Account, on a Total Company and Montana jurisdictional basis, in Excel format with formulas intact. Please cite to the locations in the Company's filing where these expenses are detailed quantitatively and integrated into the revenue requirement.

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of October, 2015, the **MONTANA LARGE CUSTOMER GROUP'S THIRD 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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