

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 FOURTH 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 27, 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 13th day of October, 2015.

MONTANA LARGE CUSTOMER GROUP

s/ Nikolus S. Stoffel
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DATA REQUESTS

LCG-046 **Re: Direct Testimony of Travis R. Jacobson, page 10, line 21 through page 11, line 6 and the Direct Testimony of Darcy J. Neigum, page 33, line 5 through page 39, line 7.**

- a. What is the date at which the joint use agreement between MDU and BEPC expires?
- b. How does the expiration date of the MDU/BEPC contract relate to the October 1, 2015 date at which BEPC and WAPA intend to join SPP as referenced on p. 33, line 13 of Mr. Neigum's direct testimony?
- c. Please identify the amount of the reduction in transmission (and distribution) charges reflected in Adjustment No. 11 that are expected to be incurred only during Calendar Year 2015 (i.e., without annualization) using the same format as Statement G, p. 12.
- d. Please identify the amount of the increase in transmission charges reflected in Adjustment No. 12 that are expected to be incurred only during Calendar Year 2015 (i.e., without annualization) using the same format as Statement G, p. 13 (but limited to the transmission entry).
- e. Does the pro-forma entry for transmission in Statement G, p. 13 reflect any increased costs expected by MDU due to the upcoming expiration of the TSA with WAPA on December 31, 2015 discussed on p. 33 of Mr. Neigum's direct testimony? If yes, please explain how this was accounted for and identify any workpapers supporting the calculation of such costs.
- f. Does the pro-forma entry for transmission in Statement G, p. 13 reflect any increased costs expected by MDU associated with 2016 RECB I project costs discussed on p. 39 of Mr. Neigum's direct testimony? If yes, please explain how this was accounted for and identify any workpapers supporting the calculation of such costs.
- g. Please refer to Workpaper G-63.
 - i. On what date was the \$0.80/MWh 2015 MVP Charge effective?
 - ii. Is the \$101,908 Pro Forma Adjustment for MVP calculated on a Calendar Year 2015 basis or an annualized 2015 basis?

LCG-047 **Re: Direct Testimony of Travis R. Jacobson, page 24, line 5 through page 25, line 13 and Exhibit TRJ-3.**

- a. Please explain why Footnote 1 in Exhibit TRJ-3 does not indicate the assessment rate that was applicable starting October 2012. Please identify the applicable assessment rate(s) from October 2012 through March 2015.
- b. Please explain why MDU calculated its claimed under-recovery of PSC and MCC taxes in Exhibit TRJ-3 by first converting its deemed recovery (in columns 7-8) using a cents/kWh rate (per Footnote 3) rather than by simply applying the

approved 0.24% total tax rate directly to the revenues in the second column of Exhibit TRJ-3. Why doesn't this latter approach produce a more accurate depiction of actual tax recovery?

LCG-048 Re: Direct Testimony of Travis R. Jacobson, page 24, line 5 through page 25, line 13 and Exhibit TRJ-3.

Please identify MDU's actual sales for resale margins for each month for the period June 2015 to the present.

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of October, 2015, the **MONTANA LARGE CUSTOMER GROUP'S FOURTH 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/ Christine Miccio

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