

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

IN THE MATTER OF the application of) REGULATORY DIVISION
Montana-Dakota Utilities Company a)
Division Of MDU Resources Group, Inc.,) DOCKET NO. D2015.6.51
for Authority to Establish Increased Rates)
for Electric Service in the State of Montana)

THE ALLIANCE FOR SOLAR CHOICE'S THIRD SET OF
DATA REQUESTS TO MONTANA-DAKOTA UTILITIES CO.

The Alliance for Solar Choice (TASC), 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 definitions and instructions apply to the attached Data Requests:

RESPONSE DATE, DEFINITIONS AND INSTRUCTIONS

Please respond to these Data Requests within fourteen (14) calendar days, i.e., by November 4, 2015.

INSTRUCTIONS

- A. Please restate the interrogatory immediately preceding each response.
- B. As used herein, the terms "MDU" or "Company" means The Montana-Dakota Utilities Company and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- C. Identify the name, title and business address of each person(s) providing each response and provide the date on which each response was created. Further, please designate the MDU witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.
- D. These requests for documents and responses are continuing in character. The Respondent is obliged to change, supplement and correct all answers to conform to available information in including such information as first

becomes available to the Respondent after the answers hereto are filed. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

- E. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.
- F. Whenever these discovery requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
- H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular discovery request.
- J. Any objection to a discovery request should clearly indicate to which part or portion of the discovery request the objection is directed.
- K. For each computer-generated document identified or produced in a response, please state separately: (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and, (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.
- L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.
- M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.
- N. If, in answering any of these discovery requests, there is deemed to be any ambiguity in interpreting either the discovery request or a definition or instruction applicable thereto, please promptly call counsel to TASC to obtain a clarification.

- O. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications.
- P The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody. “Documents” shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents.
- Q. “Study,” “studies,” “analyses” or “report(s)” denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.
- R. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Electronic copies to:

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DATA REQUESTS

TASC-049 RE: Proposed Residential Demand Charge

Please confirm that the \$1.50/kW demand charge is calculated based on the demand-related embedded costs for the residential customer class as a whole.

TASC-050 RE: EEI

Please provide copies of any communications that MDU has had with Edison Electric Institute (EEI), and/or documents that MDU has received from EEI, regarding (a) net metering, (b) three-part rates for residential customers and (c) demand charges for residential customers.

TASC-051 RE: Effect of Proposed Residential Demand Charge on non-NEM customers

Do MDU's proposed tariffs decrease rates for residential non-Net-Metering customers as a result of adding a demand charge to residential NEM customers?

TASC-052 RE: Educational materials on proposed residential demand charge

Please provide all educational materials MDU has developed related to residential demand charges.

TASC-053 RE: Related General Rate cases

Please answer the following questions regarding upcoming rate cases:

- When will MDU Resources Group be filing its next electric general rate cases in (a) Idaho, (b) Minnesota, (c) North Dakota, (d) Oregon, (e) Washington, and (f) Wyoming?
- Will MDU Resources Group introduce three-part rates for residential DG customers in those rate cases?
- Will MDU Resources Group introduce three-part rates for all residential customers in those rate cases?

TASC-054 RE: Administrative costs of proposed Residential Demand Charge

What are the estimated additional administrative costs of calculating a residential NEM customer's demand and billing for it?

TASC-055 RE: Use of excess electricity from NEM customers

Please admit or deny that excess electricity from a net-metered DG customer's solar electric generating systems go back to the Company's grid and is subsequently sold to another customer at the applicable retail rate. If denied, please fully explain.

TASC-056 RE: Number of customers by class

Please provide, by customer class for each of the past ten years, a) the number of customers (average or year end), b) the actual electric sales (in kWhs), and c) usage per customer.

TASC-057 RE: Residential Fixed Monthly charge

Referring to the Direct Testimony of Tamie Aberle at p.5, please provide all data and workpapers supporting the claim that the residential fixed monthly charge could be \$26.01 (embedded) or \$86.19 (marginal).

CERTIFICATE OF SERVICE

I hereby certify that on this, the 21st day of October, 2015 **THE ALLIANCE FOR SOLAR CHOICE'S THIRD SET OF DATA REQUESTS TO MONTANA-DAKOTA UTILITIES CO.** was e-filed with the Commission and served via U.S. Mail and email, unless otherwise noted, to the following:

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Dated: October 21, 2015 at Cary, North Carolina.

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