

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 Co. for Authority )  
to Establish Increased Rates for Electric ) DOCKET NO. D2015.6.51  
Service in the State of Montana )

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL  
TO THE MONTANA LARGE CUSTOMER GROUP**

**MCC-264**

Regarding: Cost of Service Issues  
Witness: Stephen J. Baron

In your cross-intervenor response testimony at lines 5-7, page 3, you state: “Dr. Wilson’s recommended method sends incorrect price signals to customers and is totally inconsistent with the cost drivers inherent in the MISO capacity planning protocols.” Please identify each of the cost drivers in the MISO protocols you are referring to.

**MCC-265**

Regarding: Cost of Service Issues  
Witness: Stephen J. Baron

Please provide, in electronic format, Table 1, as shown on page 11 of cross-intervenor response testimony, including all the data and supporting workpapers, with formulas and links intact.

**MCC-266**

Regarding: Cost of Service Issues  
Witness: Stephen J. Baron

Please provide all details supporting your statement on lines 9-10, page 11 of your cross-intervenor response testimony: “Dr. Wilson did not correct the error in the allocation of the Pro Forma Adjustment for Other Production O&M expenses.”

**MCC-267**

Regarding: Cost of Service Issues  
Witness: Stephen J. Baron

In reference to your cross-intervenor response testimony at lines 15-23, page 17 and lines 1-10, page 18, please provide in electronic format all calculations, supporting workpapers with formulas and links intact of the comparison of percentage increases to Rate 30 recommended by Dr. Wilson’s rate design, and the effect of marginal cost reconciliation on residential rates.