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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

In the Matter of the Application of)
MONTANA-DAKOTA UTILITIES CO.,)
a Division of MDU Resources Group,) Docket No. D2015.6.51
Inc., for Authority to Establish)
Increase Rates for Electric Service)

MONTANA-DAKOTA UTILITIES CO.'S
SECOND DATA REQUESTS TO THE LARGE CUSTOMER GROUP

- MDU-012 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins
- Please provide electronic files in Excel format, with formulas intact for all Exhibits and Schedules that provide the analytical support for the conclusions reached by Mr. Higgins.
- MDU-013 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins
- Please provide complete copies of each document, article, text report or treatise cited by Mr. Higgins in his Testimony, Appendices and Exhibits in this case.
- MDU-014 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins
- Please provide electronic files in Excel format, with formulas intact for all Exhibits and Schedules that provide the analytical support for Table KCH-1CR.
- MDU-015 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins

Please explain why each of the “MCC Incremental Adjustments” do not appear in the adjustments to the revenue requirement Mr. Higgins originally proposed.

MDU-016 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins

On page 3, lines 21-22 of the Cross-Intervenor Response Testimony, Mr. Higgins states “the revenue impact of each individual adjustment [of Table KCH-1CR] may be different if presented in a different sequence.” Please explain how the sequence was selected and how a change of sequence will impact revenue.

MDU-017 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins

Please provide any testimony Mr. Higgins has provided previously regarding end-of-period vs. average-of-period rate base on plant additions including but not limited to the average of days method.

MDU-018 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins

Please provide any Montana Public Service Commission decisions supporting Mr. Higgins position that the Commission should “reject[] the end-of-period rate base treatment . . . in favor of an average-of-period rate base,” as stated on page 6, lines 18-20 of the Cross-Intervenor Response Testimony of Mr. Higgins.

MDU-019 Regarding: Cross-Intervenor Response Testimony of Kevin C. Higgins
Witness: Higgins

Please explain how Mr. Higgins’s Cross-Intervenor Response Testimony regarding post-test year plant additions, including his criticisms of Albert E. Clark’s direct testimony, is consistent with ARM 38.5.106 and Commission precedent.

MDU-020 Regarding: Cross-Intervenor Response Testimony of Stephen J. Baron
Witness: Baron

Please provide electronic files in Excel format, with formulas intact for all Exhibits and Schedules that provide the analytical support for the conclusions reached by Mr. Baron.

MDU-021 Regarding: Cross-Intervenor Response Testimony of Stephen J. Baron
Witness: Baron

Please provide complete copies of each document, article, text report or treatise cited by Mr. Baron in his Testimony, Appendices and Exhibits in this case.

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, the foregoing was served via electronic and U.S. mail on:

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