

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 FIRST 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 October 12, 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:

Chuck Magraw
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David Wooley
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Hard or paper copies, if necessary, to:

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DATA REQUESTS

TASC-001 RE: Customers with behind-the-meter generation

Please provide the number of customers in the Montana-Dakota Service Territory that have behind-the-meter generation in the following size categories, and for each identify of the type of generation (e.g. wind, solar, Combined-Heat-and-Power, fossil fuel generator).

1-5 kW
5-10 kW
10-15 kW
15-20 kW
20-25 kW
Greater than 25 kW

TASC-002 RE: Cost of Service Analysis Supporting Net Metering Rate 92
Tariff

Provide copies of all analyses, studies, memorandum or other documents showing how the proposed “tree-part residential rate” relates to costs of serving net metering customers or customers with behind the meter generation.

TASC-003 RE: Cost of Service Analysis Supporting Net Metering Rate 92
demand charge

Provide copies of all analyses, studies, memorandum or other documents showing which costs MDU plans to recover in the proposed demand charge for net metering customers including all data supporting the cost of equipment or services involved. In your answer describe specifically which parts of the embedded class cost of service study and non-coincident demand of the residential class support the proposed demand charge.

TASC-004 RE: Net Metering

Please provide all data, analyses, report, studies to support the conclusion in Ms. Aberle’s testimony to the effect that net metering customers receive significant subsidies at the expense of other utility customers.

TASC-005 RE: Net Metering

Has the MDU undertaken any study or analysis to assess the transmission, distribution, generation, environmental control costs that are avoided when a customer generates her own power behind-the-meter or when her system exports power from such generation on to the MDU distribution system?

TASC-006 RE: Net Metering

Please provide all data, analyses, reports or studies to support the conclusion in Ms. Aberle's testimony to the effect that net metering creates "inequities" and describe what is meant by that term.

TASC-007 RE: Demand Charge for Small General Service Customers

Describe what is meant by the following statement in Ms. Aberle's testimony: "The Small General Service customers served under Rate 20 or 26 will be charged the otherwise applicable demand charge as well." In your answer describe how this proposal differs from preexisting rates for Small General Service Customers served under Rate 20 or 26.

TASC-008 RE: Demand Charge for Residential and Small General Service

Please describe the how the residential and small general service class peaks usage relate to the system peak and explain in detail how MDU used that data to allocate costs to that proposed Net Metering Rate 92 class, including identification of all cost data and cost allocators.

TASC-009 RE: Demand Charge for Residential and Small General Service

Please (a) identify and provide a copy of all data showing the cost of providing customer-related services to residential customers with behind-the-meter generation, and the cost of customer service for residential customers without behind-the-meter generation. In your answer describe the differences for (i) metering, (ii) billing, (iii) customer account costs, and (iv) any other categories of distinct Residential distributed generation (DG) customer-related service.

TASC-010 RE: Demand Charge for Residential and Small General Service

State if MDU's cost allocation methods take into account the decrease in coincident demand and energy delivered for residences or small general service customers who have

behind-the-meter solar generation. Provide the same answer for customers with behind-the-meter wind generation.

TASC-011 RE: Demand Charge for Residential and Small General Service

Provide all data, reports, studies or other information in the possession of MDU which show how customers with on-site renewable generation contribute to system peak or circuit peaks in the MDU system, and in what amounts.

TASC-012 RE: Demand Charge for Residential and Small General Service

Provide all projections in the possession of MDU which show how customers with future on-site renewable generation will contribute to system peak or circuit peaks in the MDU system, and in what amounts.

TASC-013 RE: Demand Charge for Residential and Small General Service

Please (a) state if any customer-sited solar or wind distributed generation is included or taken into account in any way in the forecasted fuel and purchased power costs used to calculate MDU's system average base fuel cost for the Test Year Period and, (b) if so, explain how and state the amount and identify (by number and page) all MDU exhibits where that is explicitly shown or implicitly reflected, or (c) if not, explain why.

TASC-014 RE: Demand Charge for Residential and Small General Service

Of the residential and Small General Service customers in MDU's service territory, please provide: (a) the number of those residential DG customers that have installed at least one energy efficiency measure under an MDU energy efficiency program; and, (b) the annual deemed energy savings attributable to the energy efficiency measures installed by those customers.

TASC-015 RE: Demand Charge for Residential and Small General Service

In regard to the previous question, state whether MDU is planning to impose a demand charge on these customers, and if not what is the rationale for the proposal to impose a demand charge with on-site generation and not the customers who invest in on-site energy efficiency technology and show all cost of service studies or analyses that describe how the cost of service for these two types of customers differs.

TASC-016 RE: Demand Charge for Residential and Small General Service

Provide any analysis in MDU's possession on the current or projected impact of customer-sited solar and wind DG on system losses, environmental control costs, generation costs (including fuel), distribution and transmission capital expenditures and explain how and provide all documents prepared and data obtained addressing that matter.

TASC-017 RE: Demand Charge for Residential and Small General Service

Provide any studies analyses or projections in MDU's possession regarding the future expansion of behind-the-meter renewable generation by customers of MDU.

TASC-018 RE: Demand Charge for Residential and Small General Service

State what percentage of MDU's residential customer of have meters capable of registering customer demand data, and explain what level of resolution (e.g. 5 minute, monthly) the data is collected, how often it is collected.

TASC-019 RE: Demand Charge for Residential and Small General Service

State what percentage of MDU's Small General Service customers have meters capable of registering customer demand data, and explain what level of resolution (e.g. 5 minute, monthly) the data is collected, how often it is collected.

TASC-020 RE: Demand Charge for Residential and Small General Service

For customers who do not currently have meters capable of registering customer demand, if those customers were to install renewable energy generation behind-the-meter, how under the company's proposed demand tariff for such customers would the installation of such meters would be paid for and by whom.

TASC-021 RE: Demand Charge for Residential and Small General Service

Please (a) state whether MDU has ever conducted or prepared any analysis of the reasonably determinable embedded costs and incremental costs to serve new customers with behind-the-meter renewable generation and the reasonably determinable benefits to its system provided by new interconnected customers for the Test Year period relied on by MDU in its Application or during the period after which MDU expects the rates proposed in its Application to become effective, (b) if so, explain why or (c) if not, explain why.

TASC-022 RE: Demand Charge for Residential and Small General Service

Explain why MDU believes that the imposition of a demand charge on customers with behind-the-meter generation is not a form of unlawful discrimination against such customers as is prohibited by the federal PURPA laws and regulations of the Federal Energy Regulatory Commission (FERC). Provide a copy of any analysis supporting the explanation that is in the possession of MDU

TASC-023 RE: Demand Charge for Residential and Small General Service

Explain why MDU believes that the imposition of a demand charge on customers with behind the meter generation is not a form of unlawful discrimination against such customers as is prohibited the laws of the State of Montana and the rules of the Montana Public Service Commission. Provide a copy of any analysis that is in the possession of MDU supporting the explanation.

TASC-024 RE: Cost of Service Study

Please provide a copy MDU response to data requests from PSC, including but not limited to: 1) the cost of service study that was included in response to PSC 001- Data Response (CD format); 2) CD for electronic copy of Excel file Rate 92 Demand.

TASC-025 RE: Cost of Service Study

Please quantify the increase in cost of transformers, service drops, and primary and secondary distribution lines for residential customers with electric space heating relative to residential customers without electric space and water heating. Provide supporting excerpts from design manuals, other engineering specifications, purchasing manuals, or other documentation.

TASC-026 RE: Cost of Service Study

Please quantify the increase in cost of transformers, service drops, and primary and secondary distribution lines for residential customers with behind-the-meter renewable generation relative to residential customers without behind-the-meter renewable generation. Provide supporting excerpts from design manuals, other engineering specifications, purchasing manuals, or other documentation.

TASC-027 RE: Cost of Service Study

Please provide all studies, analyses, workpapers, memoranda, or other documents prepared by MDU relating to the customer impacts of its proposed Rate 92 for residential and small commercial customers with behind-the-meter generation comparing current rates to those being proposed by MDU in this proceeding.

TASC-028 RE: Cost of Service Study

Please provide any studies in MDU's possession regarding the prevalence and levels of demand charges applied to residential or small commercial customers with behind-the-meter renewable generation of electric utilities in the United States and Canada. Please identify any other studies on this topic of which MDU is aware but that are not in its possession.

TASC-029 RE: Impact of new demand charge on future electric demand

Please provide all studies, analyses, workpapers, memoranda, or other documents prepared by MDU relating to the impact of the proposed Rate 92 on future demand for electricity.

TASC-030 RE: Effect of Rate 92 on utility revenues

Provide an estimate of the increased revenues that MDU expects to receive as a result of proposed Rate 92 for each of the following years: 2016; 2018; 2020; 2022; and 2024, or any such other years as the company had data or analysis.

CERTIFICATE OF SERVICE

I hereby certify that on this, the 28th day of September, 2015 **THE ALLIANCE FOR SOLAR CHOICE'S FIRST 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: September 28, 2015 at Cary, North Carolina.

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