

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**

Brad Johnson, Chairman
Travis Kavulla, Vice Chairman
Kirk Bushman, Commissioner
Roger Koopman, Commissioner
Bob Lake, Commissioner



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December 7, 2015

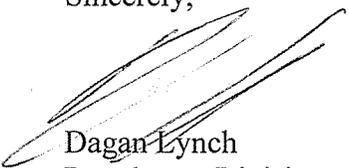
Ms. Monica Tranel
Montana Consumer Counsel
P.O. Box 201703
111 North Last Chance Gulch, Suite 1B
Helena, MT 59620-1703

RE: Data Request in Docket D2015.6.51

Dear Ms. Tranel,

Enclosed please find a data request of the Montana Public Service Commission, numbered PSC-84 through PSC-087, to the Montana Consumer Counsel in the docket referenced above. If you have any questions, please contact me at (406) 444-6184.

Sincerely,



Dagan Lynch
Regulatory Division
Montana Public Service Commission

Enclosure

cc: Service List

Service Date: December 7, 2015

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

DATA REQUESTS PSC-084 THROUGH PSC-087 OF THE
MONTANA PUBLIC SERVICE COMMISSION TO
MONTANA CONSUMER COUNSEL

PSC-084

Regarding: Labor Adjustment
Witness: Clark

- a. You reference MCC-024 as your basis for adjusting labor costs down, however that data response does not consider information regarding new responsibilities of employees. Where have you specifically found a justification to lower those salaries?
- b. Please explain what appears to be an arbitrary decrease in salaries by looking only at amounts rather than a listing in responsibilities.
- c. Please explain your understanding of MDU's overtime or premium policies as it relates to the referenced data response, MCC-024.

PSC-085

Regarding: Uncollectible Accounts
Witness: Clark

- a. Please explain why you have assumed the Commission's approval of a 32% increase.
- b. Please specify the MDU witnesses you analyzed for the 32% increase suggested in the uncollectible accounts adjustment.

PSC-086

Regarding: Decommission Costs

Witness: Clark

- a. Please provide further justification for reducing the amortization period from ten years to five years. Is it your position that expenses should simply be reduced because you feel in general a customer increase is too large?
- b. Are any of the other plants referenced in your Exhibit No. AEC-2, Page 10 of 29, owned by other entities? Are you aware of the decommissioning costs being recovered by those entities?

PSC-087

Regarding: Insurance Expense

Witness: Clark

- a. Using the insurance expenses of the years 2010, 2011, 2013, and 2014 to determine the average insurance expense provides an average of the total company expense. Have you verified what portion of the year 2012 expense is allocated to Montana? If a smaller portion is allocable to Montana, would your adjustment change?
- b. Lawsuits are a risk every company faces. In this case, an outlier might give a good indication of the burden and uncertainty of when a lawsuit may be brought forth. Do you believe that a simple average can measure an expense in a uniform nature?
- c. Is it possible that excluding year 2012 from the average only further skews the actual expenses of operating a company?