

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**

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



1701 Prospect Avenue
PO Box 202601
Helena, MT 59620-2601
Voice: 406.444.6199
Fax #: 406.444.7618
<http://psc.mt.gov>
E-Mail: psc_webmaster@mt.gov

December 7, 2015

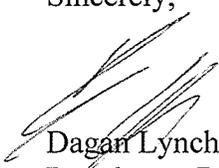
Ms. Monica Tranel
Montana Consumer Counsel
P.O. Box 201703
111 North Last Chance Gulch, Suite 1B
Helena, MT 59620-1703

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-94 through PSC-101, 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-094 THROUGH PSC-101 OF THE
MONTANA PUBLIC SERVICE COMMISSION TO
MONTANA CONSUMER COUNSEL

PSC-094

Regarding: Depreciation
Witness: Pous

- a. Please describe your definition of a trend as it relates to your testimony.

PSC-095

Regarding: Depreciation
Witness: Pous

- a. Please explain your familiarity with the PowerPlan depreciation software.

PSC-096

Regarding: Production Plant Adjustments
Witness: Pous

- a. Please explain in general how a depreciation analyst unfamiliar with a company's physical plant and its overall condition is able to breakdown different depreciation accounts to accurately account for physical condition as it relates to survivor curves.
- b. Please indicate any and all site inspections you or employees of DUCI performed during your analysis to verify plant condition.
- c. If no physical inspections were performed please indicate why.

PSC-097

Regarding: Production Plant Adjustments

Witness: Pous

- a. Regarding your testimony beginning on Page 27, you elude that wind farm technologies have improved and therefore can offer increased lives. Are you able to provide a breakdown of the varied technologies MDU has used in the company's wind farms turbines?
- b. You mention the company Siemen's in your testimony, is it possible that reliability and product support can vary greatly by makers of turbines? Is Siemen's an outlier for exceptional products?
- c. Product quality and support can increase or decrease the useful life of plant. Is it possible that MDU purchased less reliable plant and therefore should be allowed to recover the plant at a shorter life span?
- d. If MDU has not provided an acceptable amount of information to support the life spans of its windfarms please provide additional information to justify your ability to recommend an initial step to 25 years without the full information you need to provide such a recommendation.

PSC-098

Regarding: Transmission Poles and Fixtures

Witness: Pous

- a. Are you able to provide a breakdown of the condition of MDU's transmission poles to support the extended life you are recommending?

PSC-099

Regarding: Depreciation

Witness: Pous

- a. On Page 47 of your testimony, you state you do not believe words such as "expectations," "anticipations," and "likely" provide credible evidence for future actions. However, on Page 57, you partly justify your recommended life curve based on "predictive" purposes. Please reconcile the appropriateness of the word "predictive" against the previous words you deemed unfit to base judgement on.

PSC-100

Regarding: Power Plan

Witness: Pous

- a. On Page 100 you mention a new accounting system, PowerPlan, implemented by MDU. What is the reason you have not mentioned this new accounting system in your previous testimony?

PSC-101

Regarding: Depreciation

Witness: Pous

- a. In Footnote 106 you reference Docket No. 090079-EI, a proceeding before the Florida Public Service Commission. The Florida Commission adopted your recommendation of a -20% net salvage in that proceeding. Please elaborate further on why Progress Energy Florida, Inc., (PEFL), provides a valid comparison with MDU.
- b. In any other sense for comparison in this proceeding could PEFL be used as a comparison company?
- c. Please provide workpapers to support your claim that Account 356 from the Florida proceeding is similar.