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400 North Fourth Street
Bismarck, ND 58501
(701) 222-7900

February 28, 2020

Montana Department of Revenue
Sam W. Mitchell Building
125 N. Roberts, 3rd Floor
Helena, MT 59604-5805

RE: Montana-Dakota Utilities Co.
2019 Electric USB Report

Montana-Dakota Utilities Co., a Division of MDU Resources Group, Inc. herewith submits its Annual Report regarding Universal System Benefit Programs (USBP) pursuant to MCA § 69.8.402 (8) as part of the Electric Utility Industry Restructuring Law.

In accordance with 69-8-402 (MCA) Montana-Dakota, hereby submits the funds collected in 2019 that exceeded the credits for internal programs and large customer credits of \$40,247.07 described in the attached report.

Please acknowledge receipt by stamping or initialing the duplicated copy of this letter attached hereto and returning the same in the enclosed, self-addressed, stamped envelope.

Sincerely,

A handwritten signature in black ink that reads 'Tamie A. Aberle'.

Tamie A. Aberle
Directory of Regulatory Affairs

Cc: Montana Public Service Commission
Montana Consumer Counsel
Sonja Nowakowski – MT Legislative Services Division (Via Email)
Mike Green

**Montana-Dakota Utilities Co.
Universal System Benefits Program
2019 Annual Report**

The total dollars collected under the Universal System Benefit Charges (USBC) approved by the Montana Public Service Commission (Commission) during the period January 1, 2019 through December 31, 2019 was \$1,004,764.58. The large customer group, defined as customers with monthly electric billing demands of 1,000 kW or higher, accounted for \$302,288.22 of the total amount collected.

The following USBP expenditures were made in calendar year 2019 in accordance with programs approved by the Commission:

Low-Income Discount	298,577.72
Low-Income Weatherization (AEM & HRDC)	90,000.00
Low-Income Energy Audits (AEM)	10,000.00
Energy Share Endowment & Admin	35,000.00
Energy Share Bill Assistance	90,000.00
Energy Share & HRDC Furnace Safety	50,000.00
Low-Income Program Promotion (Energy Share)	5914.78
Conservation Programs (Lighting)	119,160.12

Following is a description of each program:

Montana-Dakota offers a low-income discount to all customers that have qualified for Low-Income Energy Assistance (LIEAP). The discount remains in place on a calendar basis and qualifying customer's accounts are updated annually upon the start of the LIEAP qualification process the following heating season. Beginning with the 2008-2009 LIEAP season customers qualifying for LIEAP also qualified for a discount on their electric bill based on a new discount structure filed as part of the Stipulation in Docket No. D2006.1.2 and approved by the Commission on August 20, 2008. Three levels of discount are available under this discount rate structure; 30% discount for customers at 0-60% of the federal poverty level, 25% discount for customers at 61-90% of the federal

poverty level and a 20% discount for customers at 91% to the ceiling of the federal poverty percentage of income as established by the Department of Health and Human Services in determining LIEAP benefits.

The income data used to administer the discount is received from the State Department of Health and Human Services at the time a customer qualifies for LIEAP. When combined with a LIEAP benefit, the bill discount serves to mitigate the higher percentage of disposable income necessary to pay utility bills that this group of customers pays in comparison to other customers. Following are statistics regarding the distribution of the electric discounts among the various discount levels based the percentage of poverty for calendar year 2019. On average, 1,229 customers received benefit of the discounts with the months or number of bills discounted for each customer dependent upon the time LIEAP benefits were first received on their behalf. As shown, approximately 38 percent of the recipients were in the lowest percentage of federal poverty.

Low Income Discounts January 1, 2019- December 31, 2019

% of Federal Poverty	Discount	Customers	Average Discount/Bill
0-60%	30%	462	\$(25.17)
61-90%	25%	289	(18.89)
91%-ceiling %	20%	478	(16.35)

The other low-income related programs include weatherization, energy audits, bill assistance and a furnace/water heater repair program. These programs provide assistance to low income customers located in Montana-Dakota's service territory. The bill assistance and furnace/water heater programs are administered by Energy Share of Montana in accordance with their established guidelines to provide assistance to qualifying low-income customers. In 2019, 236 households received bill assistance at an average cost of \$333 per household. The furnace safety program recognizes the problem that arises when a low-income customer is faced with a costly repair bill or in some cases the cost

of replacing space or water heating equipment. Nineteen households were assisted through this program in 2019. The Weatherization and Energy Audit Programs are administered by Action for Eastern Montana and the HRDC District VII in accordance with guidelines established by the State Department of Health & Human Services and the Department of Energy and assist low-income customers with conservation measures that result in energy savings. Weatherization services were provided to twenty-eight households utilizing USB funds in 2019 at an average cost of \$3,008 per household.

The Energy Share endowment will provide for the long-term needs of the low-income customers of Montana by providing a stable funding source for energy assistance dollars and is a cost effective program that will benefit Montana-Dakota's customers. Customer education consists of outreach required to better inform customers of the available assistance programs noted above and the Federal LIEAP program. Bill inserts, web site promotion and advertising done in conjunction with Energy Share of Montana were tools utilized in 2019. Montana-Dakota has developed a package of bill inserts, posters and direct mail pieces to assist with educating customers regarding assistance available under the programs.

In addition to the low-income related conservation programs, funds were also made available for all residential and commercial customers for conservation measures. The cost effectiveness of the conservation program offerings was determined based on the cost/benefit analyses provided in the Company's Integrated Resource Plan filed in Docket No. N2015.7.54. The Commercial Lighting program was well accepted and accounts for the majority of the conservation related funds expended in 2019.

As noted above, a total of \$302,288.22 was collected from the Large Customer Group. In accordance with 69-8-402 (MCA) the Large Customer Group has the right to self-direct funds collected through the USBC. Funds totaling \$265,864.89

will be refunded to three customers in the Large Customer group in the following amounts. Montana-Dakota currently has eight customers on its system that qualify as Large Customers. One of the eight customers will receive the total USBC dollars they each remitted in 2019 through utility service bills in the amount of \$17,928.01. A second customer submitted a claim for \$20,129.08 with a carry-over from 2018 of funds of \$2,052.22 and funds collected in 2019 of \$13,266.45 resulting in a carry over to 2020 of \$8,914.85 and the return of the \$13,266.45 collected in 2019 to the customer. The 2019 carry-over for this customer was incorrectly reported as \$9,057.36 in the report submitted on March 1, 2019. The third customer submitted a claim of \$471,840.29 utilizing the total funds collected in 2019 of \$234,670.43 and resulting in a cumulative carry-over of \$1,025,728.37 to future periods. No other large customers submitted claims resulting in \$36,423.33 of large customer funds submitted as part of the total amount submitted to the Department of Revenue.

In accordance with 69-8-402 (MCA) Montana-Dakota, hereby submits the unexpended balance of \$40,247.07 to the Department of Revenue. The determination of this amount is summarized below:

USB Funds Collected	\$1,004,764.58
Less: Program Expenditures	
Low-Income Discount	298,577.72
Low-Income Weatherization (AEM & HRDC)	90,000.00
Low-Income Energy Audits (AEM)	10,000.00
Energy Share Endowment & Admin	35,000.00
Energy Share Bill Assistance	90,000.00
Energy Share & HRDC Furnace Safety	50,000.00
Low-Income Program Promotion (Energy Share)	5,914.78
Conservation Programs (Lighting)	<u>119,160.12</u>
Total Montana-Dakota Programs	\$698,926.98
Less Large Customer Self-Directed Funds	<u>265,864.89</u>
Amount to Remit to Department of Revenue	<u><u>\$39,972.71</u></u>