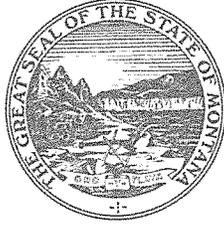


Montana Public Service Commission



Brad Johnson - Chairman
Travis Kavulla - Vice Chairman
Roger Koopman - Commissioner
Bob Lake - Commissioner
Tony O'Donnell - Commissioner

January 5, 2018

Ms. Tamie A. Aberle
Director of Regulatory Affairs
Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, North Dakota 58501

RE: Data Request in Docket D2017.9.79

Dear Ms. Aberle,

Enclosed please find Montana Public Service Commission data requests PSC-059 through PSC-108 to Montana-Dakota Utilities Co. regarding the application and supporting testimonies in the above-referenced docket. If you could please respond by January 19, 2018 it would be greatly appreciated. If you have any questions, please contact me at (406) 444-6193.

Sincerely

A handwritten signature in cursive script that reads "Scott Fabel".

Scott Fabel
Rate Analyst
Montana Public Service Commission

Enclosure

cc: Service List

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 Co., a Division of)
MDU Resources Group, Inc., for Authority to) DOCKET NO. D2017.9.79
Establish Increased Rates for Natural Gas)
Service in the State of Montana)

**DATA REQUESTS PSC-059 THROUGH PSC-108 OF
THE MONTANA PUBLIC SERVICE COMMISSION
TO MONTANA-DAKOTA UTILITIES CO.**

PSC-059

Regarding: SSIP
Witness: Most Appropriate Witness

Please explain how a tracking mechanism which rate-bases capital expenditures prior to the capital outlay being incurred provides ratepayers enough substantial benefit to justify departure from Mont. Code Ann. § 69-3-1202, which implies that capital outlay must be “used and useful” prior to being rate based.

PSC-060

Regarding: SSIP
Witness: P.C Darras

On page 28 of your testimony (lines 10-14), you represent that infrastructure replacement costs require an estimated \$4 million of funding on an annual basis for years 2018-2021. For these years, please provide the project plans, or other documentation, that substantiate the stated \$4 million funding requirement.

PSC-061

Regarding: Proxy Group
Witness: Gaske

- a. Regarding NiSource Inc., when NiSource introduced its Columbia Pipeline Spinoff, could that transaction distort the Company’s financial metrics? Please explain why such spinoff would not distort the financial metrics of the company?

- b. On page 17 of your testimony you indicated you eliminated any company that was engaged in significant mergers or acquisitions. Do you agree that merger and acquisition activities can distort market factors used on DCF and risk premium analysis?
- c. Are you aware that on October 16, 2017, South Jersey Industries announced its acquisition of Elizabeth Gas and Elkton Gas? With this new information do you agree South Jersey should be excluded from your proxy group and that an updated ROE recommendation should be provided?

PSC-062

Regarding: Flotation Costs
Witness: Gaske

In what other state jurisdictions have you testified in which the state allowed flotation costs? Please provide citations to the docket and final orders for those noted.

PSC-063

Regarding: Flotation Costs
Witness: Gaske

Please identify MDU Resources' actual flotation costs that are attributed to the Company's regulated operations? Please provide the time periods the costs were incurred, and how they were treated for rate making purposes.

PSC-064

Regarding: Bond Ratings
Witness: Gaske

Would you agree that because MDU Resources derives only 20% of its revenues from regulated gas utility operations and has riskier, unregulated operations such as drilling and exploration, that the difference in bond ratings does not necessarily indicate that MDU's gas utility operations carry more investment risk than the proxy group?

PSC-065

Regarding: DCF
Witness: Gaske

- a. Referencing your DCF model and the use of a quarterly dividend adjustment versus an annual adjustment, would you agree that using an annual yield adjustment helps smooth out short-term aberrations in the capital markets?
- b. If you used an annual dividend yield without the quarterly adjustment, what would be the increase or decrease to your recommended ROE regarding the DCF model?

- c. Please recalculate the model with an annual dividend adjustment, as opposed to a quarterly, and provide the results.
- d. Please remove the flotation cost adjustment and provide the same calculation as above.
- e. Why have you chosen not to run a multi-stage DCF analysis?

PSC-066

Regarding: Depreciation

Witness: Robinson

- a. For all graphs in Section 5, please provide a new graph showing the current and proposed Iowa Survivor curves with a maximum of 30 years in Age Life and an additional graph with a maximum of 60 years for Age in Life.
- b. If reasonably possible, please add the frequency curve to the updated graphs.

PSC-067

Regarding: Depreciation

Witness: Robinson

Regarding co-owners of any plant represented in this study, are MDU's calculations consistent with that of its co-owners? Please explain any discrepancies and compare the results for the differences.

PSC-068

Regarding: Depreciation

Witness: Robinson

- a. Regarding your forecasts of future net salvage values, please elaborate on the sources you used to estimate your annual inflation rate. Please provide workpapers showing all calculations.
- b. Is your methodology and inflation rate consistent with the rate Mr. Gaske uses in his exhibits?

PSC-069

Regarding: Depreciation

Witness: Robinson

Has MDU or its witness performed any per unit analysis on the assets represented in this study? If so, please provide those studies and indicate if the results were taken into account when developing this study.

PSC-070

Regarding: Depreciation
Witness: Robinson

On page 1-3 you reference the Company's inability to effectively track some items. With that statement in mind, please explain how the Company is able to accurately assign those costs to the correct service areas.

PSC-071

Regarding: Depreciation
Witness: Robinson

- a. Please confirm that the MDU Common Plant Depreciation Study in this proceeding is the same study, with no changes, as submitted in D2015.6.51.
- b. Please note and explain any differences between the two Common Plant Studies. In addition, please indicate what changes were the result of the stipulation in D2015.6.51.
- c. In the Common Plant Study from D2015.6.51, what were the points of contention between yourself and Mr. Pous?

PSC-072

Regarding: Depreciation
Witness: Robinson

Is the consultant or the Company proposing any phase-in period for the new depreciation adjustments to common and gas plant? If you are not, please explain your reasoning.

PSC-073

Regarding: Depreciation
Witness: Robinson

- a. Please provide a list of all physical site inspections conducted on the various representative properties.
- b. Please indicate the person responsible for inspecting the sites.
- c. Please provide the inspection reports from all site visits.

PSC-074

Regarding: Depreciation
Witness: Robinson

- a. Please indicate all accounts in which the Judgment Method for depreciable life was used.

- b. In such accounts provide greater detail and the sources you relied upon for your judgment.

PSC-075

Regarding: Depreciation
Witness: Robinson

Referencing the 1986 Tax Reform Act, and concerning the effects upon utility depreciation, the effect generally lengthened the life over which most utilities property was depreciated. Provide updated Depreciation Studies for both Common Plant and Gas Division Plant as they will be effected by the 2017 Tax Act. If no action is necessary, please explain.

PSC-076

Regarding: Gas Study, Gross investment
Witness: Kivisto

- a. Please provide the study by the American Gas Association referenced on Page 8, lines 5-10.
- b. Please provide the investments labeled as General/Common in the chart on page 10 by FERC account for each of the years shown.
- c. Please provide the investments labeled as Distribution in the chart on page 10 by FERC account for each of the years shown.
- d. On page 11 the witness asserts that increases in depreciation and taxes other than income have contributed to the need for this rate increase. Please provide financial information documenting this statement and providing the reasons for the increases.

PSC-077

Regarding: SSIP
Witness: Jacobson

- a. The testimony of Mr. Darras, page 28, states that the SSIP program would run for four years from 2018 through 2021, and it also includes approximately \$3.4 million invested in 2017. Exhibit TRJ-4 shows the estimated 2017 and 2018 SSIP revenue requirements. Please provide the estimated SSIP revenue requirements for the years 2019 through 2021 in the same format as Exh. TRJ-4.
- b. It is the understanding of staff that the 2017 SSIP revenue requirement of \$214,636 is included in the overall revenue requirement increase requested by MDU of \$2,819,131. Is this correct? If not, please explain.

- c. Does MDU intend to file immediately after the conclusion of this docket, if the SSIP is approved, for a true up of 2017 SSIP costs and estimated 2018 costs? If not, please explain.
- d. Does MDU intend to annually file a SSIP true-up for the previous year's cost and an estimate of the next year's cost? Would these filings be annual and when would they be filed?
- e. Would there be monthly tracking of SSIP costs and, if so, should those monthly costs be reported to the Commission?

PSC-078

Regarding: Day-to-day business costs
Witness: Darras

Darras, on page 33 of his testimony, states there will continue to be pipeline replacement projects in the future as part of normal day-to-day business activity and that MDU routinely replaces pipelines based on a number of factors. Please provide for the years 2013 through 2017 the number of feet of service and mains pipeline replaced by type of pipe, and the cost of the pipe replacement for each of those years. For 2017, please exclude any additions due to SSIP.

PSC-079

Regarding: SSIP
Witness: Bosch

- a. In SB-1, page 1 of 2, paragraph 1 states that that costs to be recovered under the SSIP include a current return on project costs during construction. Is MDU asking for a return on Construction Work in Progress (CWIP)? Please explain.
- b. If approved, would the 2017 pro forma SSIP revenue requirement of \$214,636 be recovered from customers in Rate 94? If so, please provide the monthly billing amounts per customer class in the same format as Exh. SB-2. If the SSIP revenue requirement is not to be recovered through Rate 94, please explain.

PSC-080

Regarding: Schedule L-2
Witness: Hatzenbuhler

Please provide an electronic copy of Schedule L-2, with the addition of the corresponding FERC account number for each line item on the schedule. The requested account numbers are in reference to FERC's Uniform System of Accounts Prescribed for Natural Gas Companies Subject to the Provisions of the Natural Gas Act.

PSC-081

Regarding: Natural gas costs

Witness: Hatzenbuhler

- a. Provide MDU's 25-year projection of natural gas supply costs in electronic format.
- b. Explain how MDU forecasts long-term natural gas supply costs.
- c. Identify any natural gas producing assets MDU plans to acquire in the next 10 years.
- d. Explain how and where MDU obtains natural gas to meet its retail load obligation, including MDU-owned gas-producing assets, storage facilities, bi-lateral contracts, and market purchases.

PSC-082

Regarding: Weather normalization

Witness: Hatzenbuhler

- a. Explain how MDU estimates average annual natural gas usage on a weather normalized basis.
- b. Provide, in electronic format, the regression analysis used to calculate weather normalized volumes for customer classes.

PSC-083

Regarding: Allocation factor #10

Witness: Hatzenbuhler

- a. Provide workpapers in electronic format which support MDU's meter weights for allocation factor #10 ("total weighted customers").
- b. Does the cost of the meter used in the calculation of allocation factor #10 include the cost of the regulator?
- c. Provide a general description of all types of meters installed on MDU's system, including, but not limited to, the date at which MDU began installing that type of meter on its system and the rating of the meter.
- d. For each type of meter installed on MDU's system, provide the average book value of the meter (the depreciated value).
- e. For each type of meter installed on MDU's system, provide the average age of the installed meter, the cost of a new meter, and the typical length of useful life.

PSC-084

Regarding: Conservation

Witness: Hatzenbuhler / other appropriate witness

- a. Provide the average usage per customer by month for each customer class (residential, small firm, large firm, small interruptible, and large interruptible) over the last 20 years on a weather-normalized basis.
- b. Describe the conservation programs that MDU currently has in place.
- c. Which conservation programs offered by MDU does MDU consider to be the most effective in terms of either participation rate or total natural gas conserved?

PSC-085

Regarding: Allocation factor #10

Witness: Hatzenbuhler

- a. In terms of an embedded cost of service study (ECOS), what cost classification (customer-, energy-, or demand-related) is MDU trying to capture by weighting customer counts by the cost of a new meter in allocation factor 10?
- b. An ECOS study is meant to allocate historical costs among customer classes. Explain why it is reasonable to weight customer counts in allocation factor #10 by the marginal cost of a new meter rather than the average book value of the meter.
- c. Explain why MDU did not or could not directly assign the cost of meters to customer classes.
- d. Are O&M costs included in the meter cost used for the weight in allocation factor #10? If so, how did MDU derive O&M cost per meter?
- e. Are labor costs for installation included in the meter cost used for the weight in allocation factor #10? If so, how did MDU derive an installation cost per meter?

PSC-086

Regarding: Allocation factor #37

Witness: Hatzenbuhler

- a. Provide workpapers in electronic format which support MDU's service line weights for allocation factor #10 ("total weighted customers").
- b. Explain what is meant by "Weighting for gas service lines is based on a ~90% model representation of the actual service lines. Service lines are not fully represented in the company's GIS because not all premise ID's are present." (See Statement L, 'Weighted Custs & Services' tab, cell A35.)

- c. Provide a general description of all types of service lines installed on MDU's system, including the date at which MDU began installing that type of service line, the typical useful life of the service line, and the capacity of the line.
- d. For each type of service line installed on MDU's system, provide the average book value of the service line (the depreciated value).

PSC-087

Regarding: Allocation factor #37

Witness: Hatzenbuhler

- a. In terms of an embedded cost of service study (ECOS), what cost classification (customer-, energy-, or demand-related) is MDU trying to capture by weighting customer counts by the cost of a new service line in allocation factor 37?
- b. An ECOS study is meant to allocate historical costs among customer classes. Explain why it is reasonable to weight customer counts in allocation factor #37 by the marginal cost of a new service line rather than the average embedded cost of the service line.
- c. Explain why MDU did not or could not directly assign the cost of service lines to customer classes.
- d. Are O&M costs included in the service line cost used for the weight in allocation factor #37? If so, how did MDU derive O&M cost per service line.
- e. Are labor costs for installation included in the service line cost used for the weight in allocation factor #37? If so, how did MDU derive an installation cost per service line?

PSC-088

Regarding: Service and meters

Witness: Hatzenbuhler

- a. Provide the annualized cost to install a meter for a new customer from each customer class.
- b. Provide the annualized cost to install a service line for a new customer from each customer class.

PSC-089

Regarding: Mains

Witness: Hatzenbuhler

- a. Provide evidence of cost causation that supports a 75% (demand-related) / 25% (customer-related) split to allocate the cost of mains among customer classes.

- b. Why did MDU remove transmission customers from the 25% customer-related portion of the allocation of the cost of mains (allocation factor #9)?
- c. Provide the demand per customer class on MDU's annual peak day over the last 20 years in Montana. If the method to measure historical peak day demand differs from the method utilized within allocation factor #2 please explain.
- d. Provide the annual 'peak day design' MDU's system has been capable of delivering over the last 20 years. In other words, the maximum capacity MDU's natural gas system was capable of delivering to in Montana during each year of the last 20 years.
- e. Over what period of time did MDU inspect to determine what its peak design day is?

PSC-090

Regarding: Mains

Witness: Hatzenbuhler

- a. Provide, in electronic format, the complete regression analysis MDU used to calculate allocation factors #2 and #5. Please include any underlying data, supporting workpapers, and documentation.
- b. Explain the difference between allocation factors #2 and #5.
- c. How is allocation factor #13, used to depreciate the cost of mains, calculated?

PSC-091

Regarding: Allocation factors

Witness: Hatzenbuhler

- a. Why did MDU use a different allocation factor to allocate the depreciation of the cost of mains (#13) than the allocation factors used to allocate the cost of mains (#2 and #9)?
- b. Why did MDU use a different allocation factor to allocate the depreciation of the cost of service regulators (#20) than the allocation factor used to allocate the cost of service regulators (#10)?
- c. What is allocation factor #22 meant to represent?
- d. What is allocation factor #27 meant to represent?

PSC-092

Regarding: Administrative and General (A&G) expenses

Witness: Hatzenbuhler

- a. What items are the primary drivers that make up A&G expenses for MDU? For example, does customer billing make up a significant portion of A&G expenses? List all items that are significant drivers of A&G expense as well as the approximate percentage of the total of A&G expense that each item accounts for.
- b. Explain how MDU allocated A&G expenses.
- c. Explain why MDU's method for allocating A&G expenses is reasonable.
- d. Allocation factor #30 appears to be a predominantly classified as a customer-related allocation factor. Explain how A&G expenses are correlated with the number of customers served.

PSC-093

Regarding: Activity in the Bakken

Witness: Miscellaneous

- a. In MDU's last natural gas rate case, MDU claimed it had seen increases in subcontractor labor costs due to the competition from the higher paying oil industry jobs (D2014.8.72, Dir. Test. Kivisto, p. 7). Has MDU seen the opposite effect in recent years due to a slowdown of oil industry jobs in the region?
- b. Please describe MDU's assessment of the current activity happening in the Bakken and how the activity impacts MDU's load forecast.
- c. Explain how MDU forecasts load in the Bakken.
- d. If available, provide MDU's load forecast, in electronic format, specific to the Bakken and communities affected by oil development in that region.

PSC-094

Regarding: Minimum distribution system

Witness: Hatzenbuhler

Has MDU performed a study to determine the cost required to deploy a minimum-sized distribution system? If so, please provide the results of the study in electronic format.

PSC-095

Regarding: Rate 72 customers

Witness: Hatzenbuhler

- a. Optional Seasonal Service Rate 72 customers are not included in MDU's ECOS. Provide cost causation evidence to support MDU's proposed rate changes to the Rate 72 tariff.
- b. How many customers take service under Rate 72?

PSC-096

Regarding: Rate 81 and 82 customers

Witness: Hatzenbuhler

- a. Transportation Customers Rate 81 and Rate 82 are not included in MDU's ECOS. Provide cost causation evidence to support MDU's proposed rate changes to Rates 81 and 82.
- b. Describe the service provided to Rate 81 and Rate 82 customers.
- c. Do any Rate 81 or Rate 82 customers utilize a service line or meter?
- d. What facilities does MDU use to deliver gas for customers under Rate 81 and Rate 82?

PSC-097

Regarding: Landlord-tenant continuous service agreements

Witness: Miscellaneous

In MDU's last natural gas rate case (D2014.8.72), MDU's tracking and implementation of landlord-tenant continuous service agreements was an issue of contention. Please explain the current status of landlord-tenant continuous service agreements and how MDU implements and maintains those agreements for property owners.

PSC-098

Regarding: Interruptible customers

Witness: Hatzenbuhler

- a. For each of the large interruptible customers that take service from MDU, provide the daily throughput by month for the last 5 years and the actual daily throughput for the test period.
- b. Provide all dates in which small or large interruptible customers had their service interrupted over the last five years. Identify which customer was interrupted and provide the reason for the interruption.
- c. Is MDU concerned about losing revenue from any customers bypassing its system? Please explain.
- d. Has MDU ever added capacity to accommodate an interruptible customer?

- e. Provide a list of all small and large interruptible sales and transportation customers. Provide the distribution delivery charge each customer is being charged.

PSC-099

Regarding: Interruptible customers

Witness: Hatzenbuhler

- a. How does MDU determine the distribution delivery charge it will charge to an interruptible customer?
- b. When you estimate the revenues that will be received from interruptible customers who have a range of potential distribution delivery charges in their tariff, what distribution delivery charge do you assume the customer class will be paying and why?
- c. You propose to increase the basic service charge for Rate 71 customers from \$194/month to \$225/month because the monthly customer-related cost for a Rate 71 customer is \$224.33/month based on your ECOS. Based on your ECOS, the monthly customer-related cost for Rate 85 customers is \$409.69/month but the basic service charge in MDU's proposed Rate 85 tariff remains unchanged at \$567.25/month. Please explain why you did not propose to reduce the basic service charge for Rate 85 customers using the same reasoning that was used to support the basic service charge you have proposed for Rate 71 customers.

PSC-100

Regarding: Rate design

Witness: Hatzenbuhler

- a. Provide an electronic copy of JRH-2 with the cost of gas excluded from the table.
- b. Explain what ratemaking objectives you are referring to on page 12, line 4 of your direct testimony.
- c. Explain why you decided to begin your proposed cost allocation among customer classes by assigning exactly half of the overall increase to the small and large firm general rate classes.
- d. After you decided to assign half of the overall increase to firm general rate customers, how did you split the cost increase between the small firm and large firm customers?

PSC-101

Regarding: Rate design

Witness: Hatzenbuhler

- a. Would you agree that if the Commission approved an increase to MDU's revenue requirement that was collected only by increasing volumetric rates, MDU would collect its full revenue requirement assuming its load projects were correct?
- b. Explain how you arrived at an increase to the residential basic service charge of three dollars per month.
- c. Explain how you arrived at an increase to the fixed basic service charge of exactly \$4.84/month for small firm customers and \$10.68/month for large firm customers.

PSC-102

Regarding: SSIP

Witness: Bosch

- a. Define 'Transmission level or flexible contract rate customers' as referenced on page 5, lines 10-11 of your direct testimony.
- b. Provide an allocation factor for MDU's proposed SSIP based on the non-gas revenues the company receives from customer classes today.
- c. Provide an allocation factor for MDU's proposed SSIP based on the non-gas revenues MDU would receive from the cost allocation and rate design proposed in its application.
- d. Does MDU propose a sunset date for the SSIP? If not, how long does MDU propose to keep the SSIP in place?
- e. Using the estimated 2019–2021 SSIP revenue requirements requested of Mr. Jacobson in DR PSC-077, please provide the monthly bill impacts of those revenue requirements in the same format utilized in Exh. SB-2. If Mr. Jacobson is unable to estimate revenue requirements for the 2019-2021 period, assume MDU's estimated annual expenditure of \$4 million.

PSC-103

Regarding: SSIP

Witness: Bosch

- a. Explain why it is reasonable to allocate the cost of SSIP projects using non-gas revenues among customer classes.
- b. Considering the SSIP is meant to improve system safety and reliability, and presuming all customers classes benefit from system safety and reliability, would it be reasonable to allocate the cost of the SSIP projects using an allocation method based on total revenues, rather than only non-gas revenues? Explain why or why not.

- c. Explain what type of process MDU envisions for the Commission to review and/or approve the SSIP projects MDU will include in its annual filing with the Commission that is mentioned on page 5, lines 1-5 of your direct testimony.
- d. Does MDU view the Commission's approval of the SSIP in this case as a pre-approval to complete SSIP projects beyond year one?

PSC-104

Regarding: SSIP

Witness: Darras

- a. Please provide a definition for a low-pressure system as referenced on page 17 of your direct testimony.
- b. Would you agree that implementing the SSIP to improve the reliability and safety of the system provides an equal benefit to all customers that utilize MDU's gas distribution system, or do some customers benefit more than others? If you believe some customer classes will benefit more than others from system reliability and safety provided through the SSIP, please explain which customer classes benefit more and why.
- c. Do you believe annual costs that MDU would like to collect through the SSIP will eventually begin to decrease? If so, when?
- d. What would be the total cost to remove and replace all early vintage steel and plastic pipe, low pressure systems, and inside meter sets on MDU's system?

PSC-105

Regarding: SSIP

Witness: Darras

- a. You state the low natural gas prices available to customers today provides a good opportunity to address the pipeline replacement project proposed to be recovered through the SSIP (p. 32 of testimony). Explain that statement: what do low gas prices today have to do with investing in distribution infrastructure, and why should low commodity prices today affect a Commission decision that would increase distribution costs to customers many years into future?
- b. Does an increase in volumes of gas shipped through a pipe speed up the rate at which it needs to be maintained or replaced?
- c. How would MDU distinguish SSIP projects from other types of maintenance/replacement projects?

- d. What other factors, aside from safety, would lead MDU to decide natural gas pipe needs to be maintained or replaced?
- e. How much does MDU currently spend annually on replacing pipe for non-safety reasons? How much does MDU currently spend annually on replacing pipe for safety reasons?

PSC-106

Regarding: Outages/Capacity constraints

Witness: Darras

- a. How many outages and service requests has MDU had in Montana on an annual basis over the last five years?
- b. Identify any new programs (such as PCAD) that MDU acquired during that time frame which may have increased/decreased the number of service requests received.
- c. Does MDU have a sort of “heat map” which shows capacity constraints throughout MDU’s system on its peak day? For example, the sections of the system that are highly capacity constrained may be shown in red, while other parts of the system that have capacity available would be shown in another color. If MDU has any type of map such as this, please provide it in electronic format, if possible.

PSC-107

Regarding: Additional tariff changes

Witness: Bosch

- a. How many customers would be affected by the proposed change to Rates 71 and 85 that are described on the second bullet point on page 8 of your direct testimony?
- b. Regarding the proposed change to Rates 71 and 85 referenced in part (a), what is the additional equipment that would likely be needed for the customer and what is the approximate cost of the equipment? Could the customer obtain and provide his/her own equipment instead of it being supplied by MDU?
- c. With regard to the issue referenced in part (a), to what extent would the customer need to contribute funds as the proposed language in the tariff for Rate 71 and 85 is as follows: “Customer may be required, upon consultation with the Company, to contribute towards additional metering equipment necessary for daily measurement by the Company....”

- d. Regarding the proposed language in part (c), how would MDU determine which customers need to contribute funds and how much the customer would need to contribute?
- e. Regarding the proposed language in part (c), describe what sort of consultation would be taking place between the customer and the Company.

PSC-108

Regarding: Changes to General Provisions Rate 100

Witness: Bosch

- a. Where did MDU obtain the time frames of 6 months and 6 years to set the limit for recovery of undercharges to customers?
- b. If a customer asked to have a manual metering reading today, what would the annual charge be?
- c. What are the overtime charges for disconnection / reconnection?
- d. Why is the Company proposing to increase the returned check charge from \$20 to \$40?