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

June 13, 2011

Ms. Patricia Van Gerpen Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Pierre, SD 57501-5070

> Re: Docket No. EL11-\_\_\_\_\_ 2011-2012 Avoided Costs Update

Dear Ms. Van Gerpen:

In accordance with South Dakota Codified Laws, Chapter 49-34A, Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc., herewith electronically submits for Commission approval revisions to the Company's Occasional Power Purchase Non-Time Differentiated Rate 95, Short-Term Power Purchase Rate 96, and Long-Term Power Purchase Rate 97 tariffs. This filing is made in compliance with the Commission's Order No. F-3365 and in accordance with the Special Terms and Conditions of these tariffs which state that the rate schedules will be reviewed annually and revised when necessary.

The methodology used to develop the proposed energy and capacity payments is consistent with the approved avoided cost rate tariffs. The proposed energy payments for Rates 95, 96 and 97 were generated using Montana-Dakota's production costing model (ProSym), updated to reflect a test year of July 2011 through June 2012. The proposed energy payments under Rates 95, 96 and 97 reflect an increase in the energy payment per Kwh attributable to the higher Midwest Independent System Operator (MISO) market prices than those included in the currently approved energy payments. Montana-Dakota used the new peaking facility approach to calculate the proposed capacity payments as has been used historically. The proposed energy and capacity payments are shown in Attachment A, page 1 and page 2 respectively.

Montana-Dakota has reinstated the time of day provision with respect to energy payments applicable to Rate 96. The proposed capacity payments for Rate 96 reflect the projected levelized costs of a new peaking facility and Rate 97 are the projected levelized costs of a base load unit. The avoided cost for Rate 96 was based on the estimated cost of a gas turbine of \$857/KW in 2010 dollars, as used in the Company's 2011 Integrated Resource Plan submitted to the Commission on June 4, 2011. The avoided capacity cost for Rate 97 was based on the estimated cost of a base load unit

at \$2,560/KW. The data used to support the proposed energy and capacity payments is included as Attachment A.

Montana-Dakota has reviewed the metering charges applicable under Rates 95, 96 and 97 and has determined no changes in the monthly charge are necessary in this annual update.

Included herein is a second set of the affected tariffs on which Montana-Dakota has indicated the revisions requested by lining through the existing language which the Company proposes to delete and clearly highlighting the new language proposed. In accordance with the Administrative Rules of South Dakota (ARSD), 20:10:13:39(6), Montana-Dakota currently has one customer taking service under Rate 95 in South Dakota. The proposed annual change in revenue, assuming the same customer load and generation as the past twelve months, would be diminutive. Included as Attachment B is the South Dakota "Report of Tariff Schedule Change" form required pursuant to ARSD 20:10:13:26. Also included as Attachment C is the "Data Requirements" in accordance with the Commission's Order No. F-3563 which discloses certain information for miscellaneous filings.

The Company will comply with ARSD 20:10:13:18 by posting the Notice shown in Attachment D in a conspicuous place in each business office in its affected electric service territory in South Dakota for at least 30 days before the change becomes effective.

Please refer all inquiries regarding this filing to:

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

Also, please send copies of all written inquiries, correspondence and pleadings to:

Mr. Daniel S. Kuntz Associate General Counsel MDU Resources Group, Inc. P. O. Box 5650 Bismarck, ND 58506-5650

This filing has been electronically submitted to the Commission in accordance with

ARSD 20:10:01:02:05. Montana-Dakota respectfully requests that this filing be accepted as being in full compliance with the filing requirements of this Commission.

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

Sincerely,

Tamie A. Aberle

Regulatory Affairs Manager

Attachment