MONTANA-DAKOTA UTILITIES CO. A Division of MDU Resources Group, Inc.

Before the Public Utilities Commission of South Dakota

Docket No. NG05-____

Direct Testimony of Tamie A. Aberle

| 1 | Q. | Would you please state your name and business address? |
|----|----|--|
| 2 | Α. | Yes. My name is Tamie A. Aberle, and my business address is |
| 3 | | 400 North Fourth Street, Bismarck, North Dakota 58501. |
| 4 | Q. | What is your position with Montana-Dakota Utilities Co.? |
| 5 | A. | I am the Pricing & Tariff Manager in the Regulatory Affairs |
| 6 | | Department of Montana-Dakota Utilities Co. (Montana-Dakota), a Division |
| 7 | | of MDU Resources Group, Inc. |
| 8 | Q. | What are your responsibilities as the Pricing & Tariff Manager? |
| 9 | Α. | My responsibilities include the preparation of rate design and |
| 10 | | miscellaneous tariff revision filings to ensure that the applicable revenue |
| 11 | | requirements are properly recovered from various customer classes via |
| 12 | | applicable rate forms. I also administer utility tariffs and rules and regula- |
| 13 | | tions effective in each of the jurisdictions in which Montana-Dakota |
| 14 | | provides utility service. |
| 15 | Q. | Would you please outline your educational and professional background? |
| 16 | Α. | I graduated from Moorhead State University, Moorhead, Minnesota |
| 17 | | in 1982 with a Bachelor of Science degree in Accounting. I began my |
| 18 | | career with Montana-Dakota in 1983 in the Regulatory Affairs Department. |
| 19 | | I was promoted to Rate Administration Supervisor in 1990 and achieved |
| | | |

1 my present position in May 1999.

2 Q. Have you testified in other proceedings before regulatory bodies? 3 Α. Yes. I have previously presented testimony before this 4 Commission, the Public Service Commissions of Montana, North Dakota and Wyoming, and the Minnesota Public Utilities Commission. 5 6 Q. What is the purpose of your testimony in this proceeding? 7 Α. The purpose of my testimony is to present the results of the class 8 cost of service study, to address the effect of the identified revenue 9 requirement on each of the customer classes and the revenues proposed 10 to be collected from each class of customers. I also provide support for 11 the Company's recommendation to implement the Distribution Delivery 12 Stabilization Mechanism (DDSM) in the Company's East River service 13 area. 14 What statements and exhibits are you sponsoring in this proceeding? Q. 15 Α. I am sponsoring Statement N, Statement O and Exhibit No. (TAA-1) through Exhibit No. (TAA-3). I also sponsor the proposed 16 17 rate schedules appended to the Application in this proceeding. 18 Q. Do the proposed changes affect the customers served in Montana-19 Dakota's Black Hills service territory? 20 Α. No. The changes proposed in this Docket are applicable only to 21 the customers served by Montana-Dakota in the East River service 22 territory of South Dakota. 23 Q. What is the effect of the increase associated with the total revenue 24 requirement of \$1,786,862 as identified by Ms. Mulkern? The \$1,786,862 increase in the revenue requirement identified by 25 Α. 26 Ms. Mulkern would result in an overall increase in revenues of 27% with

an annual increase in revenues of 43% required from the residential
 service customers and an annual increase in revenues of 14% required
 from the firm general service customers.

4 Q. Are you proposing rates necessary to collect the total increase in the
5 revenue requirement of \$1,786,862?

6 Α. No. As Mr. Imsdahl has testified, the Company is proposing to 7 increase its revenues by a total amount of \$849,745 in this rate 8 proceeding. The proposed overall revenue increase has been determined 9 based on market considerations and rate design objectives. The objective of collecting total revenues sufficient to earn a reasonable return on the 10 11 investment necessary to serve the East River customers has been 12 moderated in this case to minimize rate impacts to customers and to 13 remain competitive with alternate fuels.

Q. Please describe the rate design objectives that did provide the basis for
determining the amount of revenue increase proposed in this rate case.

A. The following rate design objectives provided the basis for the
increase requested: 1) Reflecting the cost of providing service to each
customer class 2) Encouraging sound economic energy use 3) Creating
rates that are easily understood and accepted by customers 4)
Moderating billing impacts and avoiding undue price discrimination and 5)

- 21 Minimizing intra-class subsidies.
- Q. Would you please explain the embedded class cost of service studycontained in Statement N?

A. Yes. The embedded class cost of service study provided in
Statement N was based on the total overall revenue requirement
necessary to produce a return on average rate base of 9.921%. Turning

1 to Statement N, Schedule N-1, the first report appearing therein is entitled 2 "Cost of Service by Component." This report shows the total dollars and 3 unit cost required under each service class if the overall requested 4 9.921% rate of return was to be earned for the demand, energy and 5 customer cost components of each rate schedule. 6 Statement N, Schedule N-1, page 2 provides a summary of the 7 detailed reports showing the allocation of each of the cost of service 8 items. 9 Statement N. Schedule N-2 is a report that shows how the various 10 allocation factors and items directly assigned were applied in producing 11 the various reports shown in Schedule N-1. 12 Statement N, Schedule N-3 is a list of the allocation factors used to 13 produce the various reports shown in Schedule N-1. By using the 14 Allocation Assignment Report and the Allocation Factor Report, it can be 15 readily determined how the various components of revenue, expense, and plant were allocated or assigned among the classes of service. 16 17 As noted above the class cost of service study is based on the 18 results for South Dakota - East River gas operations recorded for the 12 months ended December 31, 2004 as adjusted to reflect known and 19 20 measurable changes. 21 What were the results of the cost of service study? Q. 22 Α. The results are summarized on Statement N, Schedule N-1, Page 23 2. The overall South Dakota gas rate of return based on the actual results for the 12 months ending December 31, 2004 adjusted for known and 24 25 measurable changes is -7,699%. The returns by customer class are as shown below: 26

| 1 | Residential Service | -11.809% |
|---|----------------------|----------|
| 2 | Firm General Service | -01.664% |

3 Q. For what purpose has the class cost of service study been used?

A. The study results have been used as a guide in the distribution of
total revenue requirements among customers and for the purpose of
pricing the various components comprising the total rate applicable to
each customer class.

8 Q. What methodology did you use to apportion the proposed rate increase9 among the customer classes?

A. In designing the proposed rates to reflect the additional revenue
requirements, I have attempted to group the class rates of return more
closely about the overall system return. In order to accomplish this,
approximately 64% of the proposed increase has been allocated to the
Residential class and approximately 36% of the total targeted increase of
\$850,000 has been allocated to the Firm General Service class.

Q. What would the allocation of the revenue increase have been to each
class based strictly on the results of the embedded class cost of service
study?

A. Application of the embedded class cost of study would have
resulted in approximately 89% of the increase being allocated to the
residential class with the remaining 11% allocated to the Firm General
Service class. The allocation I have proposed has been moderated in
order to better meet the rate design objectives noted above.

Q. What is the percentage of the proposed increase by class of customer?
A. As shown on Exhibit No. (TAA-1), and as shown in the table
below, the proposed increase to each of the classes is as follows:

| Class | <u>% Increase</u> |
|------------------------|-------------------|
| Residential | 17.8% |
| Firm General Service | 9.0% |
| Firm Contracts Service | 0.0% |
| Overall | 12.8% |

- Q. Please further explain how the increases you are proposing will affect the
 residential customers.
- A. The residential class on average uses only 61 dk per customer on
 an annual basis. The average increase for the residential class based on
 this average annual use of 61 dk is 17.8% or \$9.10 per month. A
 customer using natural gas for space and water heating averaging about
- 7 85 dk annually will see an increase of about 15% or \$10.48 per month.
- 8 Q. How are you proposing to collect the allocated increase from the East
- 9 River customers?

10 Α. First, I am proposing to separate the current East River General 11 Service tariff into a Residential rate schedule and a Firm General Service 12 rate schedule. This separation provides consistency between the Company's South Dakota service territories as well as recognizing the 13 14 diversity existing in the current single firm service customer class. Secondly, I am proposing increases to the Basic Service Charges 15 applicable under the Residential and Firm General Service classes that 16 17 will equate the East River Basic Service Charges with those applicable in 18 the Company's Black Hills service area. The Basic Service Charge under

1 Residential Rate 66 has been set at \$0.25 per day which reflects an 2 average monthly charge of \$7.60 or an increase of \$5.60 per month from 3 the currently effective charge. The Basic Service Charge applicable to the 4 proposed Firm General Service Rate 76 customers has been set at \$0.35 5 per day for customers with meters rated less than 500 cubic feet per hour and \$0.70 per day for customers requiring the larger meters capable of 6 7 measuring gas flows of 500 cubic feet per hour or greater. The resulting 8 average monthly charges will be \$10.64 and \$21.28 respectively, 9 representing an increase of \$8.64 per month in the Basic Service Charge 10 applicable to customers using meters rated less than 500 cubic feet per 11 hour and an increase of \$17.28 per month in the Basic Service Charge for 12 customers requiring meters rated at 500 cubic feet per hour or higher. 13 The remaining increase in revenues, after taking into account the 14 revenue increase associated with the changes in the Basic Service 15 Charge, will be collected through the applicable Distribution Delivery 16 Charge components. The derivation of the proposed rates is shown in 17 Statement O, Schedule O-1. 18 How do the increases in the Basic Service charge meet the rate design Q. 19 objectives described above? 20 Increasing the Basic Service Charges aligns with the Company's Α. 21 rate design objectives as moving toward recovering fixed costs through a

fixed charge more accurately recovers the cost of serving each customer 23 class, provides the proper price signal for the customer to allow for more

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efficient use of natural gas service and eliminates a portion of the intra-1 class rate subsidy occurring under current rates. Increasing the Basic 2 3 Service Charge results in less fixed costs required to be recovered 4 through the volumetric Distribution Delivery Charge. This results in 5 customers paying less distribution costs, than they would be without the 6 proposed increase in the Basic Service Charge, in the winter months 7 when natural gas use is higher. The proposed Basic Service Charges 8 are also well below the customer costs identified in the embedded class 9 cost of service study.

10 Q. Would you please explain Exhibit No. ____(TAA-2)?

A. Yes. Exhibit No. (TAA-2) depicts bill comparisons based on
typical monthly consumption levels for an annual period for residential and
firm general service customers. Also shown are the increases associated
with varying levels of monthly gas use.

15 Are you proposing to implement the Distribution Delivery Stabilization Q. 16 Mechanism that is currently applicable in the Black Hills' service tariff? 17 A. Yes. A Distribution Delivery Stabilization Mechanism (DDSM) is being proposed as a means of adjusting customers' bills to reflect normal 18 19 weather. The proposed DDSM Rate 87 tariff specifies the procedure to 20 be utilized to correct for the over/under collection of distribution delivery 21 charge revenues due to weather fluctuations during the heating season, defined as October 1 through April 30. The DDSM will provide a better 22 23 matching, with regard to volumes used in the case, to determine the

charge per dk necessary to recover the authorized distribution costs and 1 2 the collection of distribution revenues. Because the volumes used to 3 calculate the distribution delivery charge are based on volumes expected 4 under normal weather conditions, the Company will either over collect 5 distribution revenues if weather is colder than normal or under collect distribution revenues if weather is warmer than normal. As described in 6 7 the Rate 87 tariff, a DDSM adjustment is calculated based on a ratio of 8 the normal heating degree days as compared to the actual heating degree 9 days which will be multiplied by the temperature sensitive consumption 10 per customer per heating degree day, as determined in the most recent 11 general rate case. A temperature sensitive use will be calculated for each 12 rate schedule by dividing the lowest use from the preceding 12 months by 13 the number of customers in that month. The temperature sensitive use will 14 remain the same until Montana-Dakota files another general rate case 15 and the change in temperature sensitive use is significant. The DDSM 16 rate will be stated as a surcharge or credit on all customers' bills to which 17 the DDSM is applicable. If weather is colder than normal the DDSM will be 18 a credit adjustment and reduce customers' bills. If weather is warmer 19 than normal the DDSM will be a positive adjustment and increase 20 customers' bills.

Q. Would you please briefly describe other changes made to the Company'sgas tariff?

23 A. Yes. As previously noted, Montana-Dakota is proposing a new

| 1 | | rate, Firm General Gas Service Rate 76. By establishing an additional rate |
|----|----|--|
| 2 | | schedule, service availability will be identified more clearly in the East |
| 3 | | River area. Minor changes, which are self explanatory, have also been |
| 4 | | made to certain areas of the rate schedules. These changes are clearly |
| 5 | | denoted on the tariff sheets reflecting the legislative format. |
| 6 | Q. | Ms. Aberle how are you providing notice to customers affected by the |
| 7 | | proposed rate increase and changes in rates? |
| 8 | Α. | In addition to posting the Notice required by ARSD 20:10:13:18 in |
| 9 | | the Company's offices, the Notice of Proposed Change in Rates provided |
| 10 | | in Exhibit No(TAA-3) will be inserted into the bills of customers |
| 11 | | located in the East River service territory starting on April 4, 2005. |
| 12 | Q. | Does this conclude your direct testimony? |
| 13 | A. | Yes, it does. |

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MONTANA-DAKOTA UTILITIES CO. **REVENUES UNDER CURRENT AND PROPOSED RATES** GAS UTILITY - EAST RIVER

| | | Pro Forma 1/ | | Total Proposed | Proposed Revenue | Percent |
|--------------------------------|-----------|--------------|-------------|-------------------|---------------------|----------|
| Customer Class/Rate | Customers | Dk | Revenue | Revenue | Increase | Increase |
| Residential - Rate 66 | 4,963 | 310,028 | \$3,075,611 | \$3,622,353 | \$546,742 | 17.8% |
| Firm General Service - Rate 76 | 838 | 350,713 | 3,368,184 | 3,671,187 | 303,003 | 9.0% |
| Firm Contract Service Rate | 1 | 29,440 | 195,117 | 195,117 | 0 | 0.0% |
| Total East River | 5,802 | 690,181 | \$6,638,912 | \$7,488,657 | \$849,745 | 12.8% |

1/ Rule 20:10:13:85 Statement I, Page 3.



Docket No. _____ Exhibit No. _____ (TAA-2 Page 1 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON RESIDENTIAL GAS SERVICE

| | | Present | Proposed | Amount of | % |
|-----------|----|----------|----------|-----------|----------|
| Month | Dk | Rate | Rate | Increase | Increase |
| January | 11 | \$106.90 | \$120.21 | \$13.31 | 12.45% |
| February | 8 | 78.29 | 88.79 | 10.50 | 13.41% |
| March | 8 | 78.29 | 89.54 | 11.25 | 14.37% |
| April | 5 | 49.68 | 58.62 | 8.94 | 18.00% |
| May | 3 | 30.61 | 38.42 | 7.81 | 25.51% |
| June | 2 | 21.07 | · 27.95 | 6.88 | 32.65% |
| July | 1 | 11.54 | 17.97 | 6.43 | 55.72% |
| August | 1 | 11.54 | 17.97 | 6.43 | 55.72% |
| September | 2 | 21.07 | 27.95 | 6.88 | 32.65% |
| October | 4 | 40.14 | 48.65 | 8.51 | 21.20% |
| November | 7 | 68.75 | 79.07 | 10.32 | 15.01% |
| December | 9 | 87.82 | 99.77 | 11.95 | 13.61% |
| Total | 61 | \$605.70 | \$714.91 | \$109.21 | 18.03% |

Average Increase per Month

\$9.10

| RATE 66 | Current 1/ | Proposed 2/ |
|-----------------------|------------|-------------|
| Basic Delivery Charge | \$2.00 | \$0.25 |
| Distribution Delivery | 1.761 | 2.449 |
| Cost of Gas | 7.775 | 7.775 |

 Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.

Docket No. _____ (TAA-Page 2 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON RESIDENTIAL GAS SERVICE

| | PRESENT | PROPOSED | AMOUNT OF | % |
|----|--|---|---|---|
| | RATE | RATE | INCREASE | INCREASE |
| 0 | \$2.00 | \$7.60 | \$5.60 | 280.00% |
| 5 | 49.68 | 58.72 | 9.04 | 18.20% |
| 10 | 97.36 | 109.84 | 12.48 | 12.82% |
| 15 | 145.04 | 160.96 | 15.92 | 10.98% |
| 20 | 192.72 | 212.08 | 19.36 | 10.05% |
| 25 | 240.40 | 263.20 | 22.80 | 9.48% |
| 30 | 288.08 | 314.32 | 26.24 | 9.11% |
| 35 | 335.76 | 365.44 | 29.68 | 8.84% |
| 40 | 383.44 | 416.56 | 33.12 | 8.64% |
| 45 | 431.12 | 467.68 | 36.56 | 8.48% |
| 50 | 478.80 | 518.80 | 40.00 | 8.35% |
| 60 | 574.16 | 621.04 | 46.88 | 8.16% |
| 70 | 669.52 | 723.28 | 53.76 | 8.03% |
| 80 | 764.88 | 825.52 | 60.64 | 7.93% |
| 90 | 860.24 | 927.76 | 67.52 | 7.85% |
| 00 | 955.60 | 1,030.00 | 74.40 | 7.79% |
| | 0 5 10 15 20 25 30 35 40 45 50 60 70 80 90 00 | PRESENT RATE 0 \$2.00 5 49.68 10 97.36 15 145.04 20 192.72 25 240.40 30 288.08 35 335.76 40 383.44 45 431.12 50 478.80 60 574.16 70 669.52 80 764.88 90 860.24 00 955.60 | PRESENT PROPOSED RATE RATE 0 \$2.00 \$7.60 5 49.68 58.72 10 97.36 109.84 15 145.04 160.96 20 192.72 212.08 25 240.40 263.20 30 288.08 314.32 35 335.76 365.44 40 383.44 416.56 45 431.12 467.68 50 478.80 518.80 60 574.16 621.04 70 669.52 723.28 80 764.88 825.52 90 860.24 927.76 00 955.60 1,030.00 | PRESENT RATE PROPOSED RATE AMOUNT OF INCREASE 0 \$2.00 \$7.60 \$5.60 5 49.68 58.72 9.04 10 97.36 109.84 12.48 15 145.04 160.96 15.92 20 192.72 212.08 19.36 25 240.40 263.20 22.80 30 288.08 314.32 26.24 35 335.76 365.44 29.68 40 383.44 416.56 33.12 45 431.12 467.68 36.56 50 478.80 518.80 40.00 60 574.16 621.04 46.88 70 669.52 723.28 53.76 80 764.88 825.52 60.64 90 860.24 927.76 67.52 00 955.60 1,030.00 74.40 |

| RATE 66 Basic Delivery Charge | Current 1/ | Proposed 2/ |
|----------------------------------|------------|----------------|
| Distribution Delivery | 1.761 | 30.23 2.449 |
| Cost of Gas | 7.775 | 7.775 |

- 1/ Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.
- 2/ Cost of gas equals weighted cost of gas for 2005.

Docket No. _____ Exhibit No. _____ (TAA Page 3 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON (Proposed Rate 76) FIRM GENERAL GAS SERVICE (< 500 Cubic Feet Per Hour Meters)

| MONTH | DK | PRESENT RATE | PROPOSED RATE | AMOUNT OF | % INCREASE |
|-----------|-----|-----------------|------------------|-----------|---------------|
| January | 20 | \$192.72 | \$212.99 | \$20.27 | 10.52% |
| February | 15 | 145.04 | 161.41 | 16.37 | 11.29% |
| March | 15 | 145.04 | 162.46 | 17.42 | 12.01% |
| April | 9 | 87.82 | 101.46 | 13.64 | 15.53% |
| May | 7 | 68.75 | 81.60 | 12.85 | 18.69% |
| June | 4 | 40.14 | 50.93 | 10.79 | 26.88% |
| July | 2 | 21.07 | 31.06 | 9.99 | 47.41% |
| August | 2 | 21.07 | 31.06 | 9.99 | 47.41% |
| September | 5 | 49.68 | 61.04 | 11.36 | 22.87% |
| October | 8 | 78.29 | 91.71 | 13.42 | 17.14% |
| November | 13 | 125.97 | 141.89 | 15.92 | 12.64% |
| December | 17 | 164.11 | 182.67 | 18.56 | 11.31% |
| Total | 117 | \$1,139.70 | \$1,310.28 | \$170.58 | 14.97% |

Average Increase per Month

\$14.22

| | Current 1/ | Proposed 2/ |
|-----------------------|------------|-------------|
| Basic Delivery Charge | \$2.00 | \$0.35 |
| Distribution Delivery | 1.761 | 2.332 |
| Cost of Gas | 7.775 | 7.775 |

 Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.

Docket No. _____ Exhibit No. _____ (TAA Page 4 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON (Proposed Rate 76) FIRM GENERAL GAS SERVICE (> 500 Cubic Feet Per Hour Meters)

| MONTH | DK | PRESENT RATE | PROPOSED RATE | AMOUNT OF | % INCREASE |
|-----------|-------|-----------------|------------------|------------|---------------|
| January | 255 | \$2,435.68 | \$2,598.99 | \$163.31 | 6.70% |
| February | 195 | 1,863.52 | 1,990.47 | 126.95 | 6.81% |
| March | 195 | 1,863.52 | 1,992.57 | 129.05 | 6.93% |
| April | 121 | 1,157.86 | 1,243.95 | 86.09 | 7.44% |
| May | 75 | 719.20 | 779.73 | 60.53 | 8.42% |
| June | 45 | 433.12 | 475.82 | 42.70 | 9.86% |
| July | 30 | 290.08 | 324.91 | 34.83 | 12.01% |
| August | 30 | 290.08 | 324.91 | 34.83 | 12.01% |
| September | 60 | 576.16 | 627.42 | 51.26 | 8.90% |
| October | 105 | 1,005.28 | 1,082.94 | 77.66 | 7.73% |
| November | 165 | 1,577.44 | 1,688.66 | 111.22 | 7.05% |
| December | 225 | 2,149.60 | 2,295.78 | 146.18 | 6.80% |
| Total | 1,501 | \$14,361.54 | \$15,426.15 | \$1,064.61 | 7.41% |

Average Increase per Month

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\$88.72

| | Current 1/ | Proposed 2/ |
|-----------------------|------------|-------------|
| Basic Delivery Charge | \$4.00 | \$0.70 |
| Distribution Delivery | 1.761 | 2.332 |
| Cost of Gas | 7.775 | 7.775 |

1/ Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.

Docket No. _____ Exhibit No. _____ (TAA-Page 5 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON (Proposed Rate 76) FIRM GENERAL GAS SERVICE (< 500 Cubic Feet Per Hour Meters)

| DK | PRESENT RATE | PROPOSED RATE | AMOUNT OF | % INCREASE |
|-----|-----------------|------------------|-----------|---------------|
| | | | | |
| 10 | \$97.36 | \$111.71 | \$14.35 | 14.74% |
| 15 | 145.04 | 162.25 | 17.21 | 11.87% |
| 20 | 192.72 | 212.78 | 20.06 | 10.41% |
| 25 | 240.40 | 263.32 | 22.92 | 9.53% |
| 30 | 288.08 | 313.85 | 25.77 | 8.95% |
| 35 | 335.76 | 364.39 | 28.63 | 8.53% |
| 40 | 383.44 | 414.92 | 31.48 | 8.21% |
| 45 | 431.12 | 465.46 | 34.34 | 7.97% |
| 55 | 526.48 | 566.53 | 40.05 | 7.61% |
| 60 | 574.16 | 617.06 | 42.90 | 7.47% |
| 70 | 669.52 | 718.13 | 48.61 | 7.26% |
| 80 | 764.88 | 819.20 | 54.32 | 7.10% |
| 90 | 860.24 | 920.27 | 60.03 | 6.98% |
| 100 | 955.60 | 1,021.34 | 65.74 | 6.88% |
| 110 | 1,050.96 | 1,122.41 | 71.45 | 6.80% |
| 150 | 1,432.40 | 1,526.69 | 94.29 | 6.58% |

| | Current 1/ | Proposed 2/ |
|-----------------------|------------|-------------|
| Basic Delivery Charge | \$2.00 | \$0.35 |
| Distribution Delivery | 1.761 | 2.332 |
| Cost of Gas | 7.775 | 7.775 |

1/ Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.

Docket No. _____ (TAA-: Exhibit No. _____ (TAA-: Page 6 of 6

MONTANA-DAKOTA UTILITIES CO. GAS UTILITY - EAST RIVER RATE 66 BILL COMPARISON (Proposed Rate 76) FIRM GENERAL GAS SERVICE (> 500 Cubic Feet Per Hour Meters)

| _ | DK | PRESENT RATE | PROPOSED RATE | AMOUNT OF | % INCREASE |
|---|-----|-----------------|------------------|-----------|---------------|
| | | | | | |
| | 20 | \$194.72 | \$223.42 | \$28.70 | 14.74% |
| | 30 | 290.08 | 324.49 | 34.41 | 11.86% |
| | 40 | 385.44 | 425.56 | 40.12 | 10.41% |
| | 50 | 480.80 | 526.63 | 45.83 | 9.53% |
| | 75 | 719.20 | 779.31 | 60.11 | 8.36% |
| | 100 | 957.60 | 1,031.98 | 74.38 | 7.77% |
| | 150 | 1,434.40 | 1,537.33 | 102.93 | 7.18% |
| | 200 | 1,911.20 | 2,042.68 | 131.48 | 6.88% |
| | 250 | 2,388.00 | 2,548.03 | 160.03 | 6.70% |
| | 300 | 2,864.80 | 3,053.38 | 188.58 | 6.58% |
| | 350 | 3,341.60 | 3,558.73 | 217.13 | 6.50% |
| | 400 | 3,818.40 | 4,064.08 | 245.68 | 6.43% |
| | 450 | 4,295.20 | 4,569.43 | 274.23 | 6.38% |
| | 500 | 4,772.00 | 5,074.78 | 302.78 | 6.34% |
| | 550 | 5,248.80 | 5,580.13 | 331.33 | 6.31% |
| | 600 | 5,725.60 | 6,085.48 | 359.88 | 6.29% |
| | | | | | |

| | Current 1/ | Proposed 2/ |
|-----------------------|------------|-------------|
| Basic Delivery Charge | \$4.00 | \$0.70 |
| Distribution Delivery | 1.761 | 2.332 |
| Cost of Gas | 7.775 | 7.775 |

1/ Distribution rates effective with service rendered on and after August 10, 1993 Docket No.NG93-003 and weighted cost of gas for 2005.

Docket No. _____ Exhibit No. _____ (TAA-3) Page 1 of 1

Montana-Dakota Utilities Co. Notice of Proposed Increase in Natural Gas Rates

On March 24, 2005, Montana-Dakota Utilities Co. (Montana-Dakota) filed an application with the South Dakota Public Utilities Commission (Commission) for an increase in prices charged for natural gas service to its customers in the East River service area which includes the communities of Agar, Bowdle, Ft. Pierre, Gettysburg, Glenham, Ipswich, Mobridge, Onida, Pierre, Roscoe and Selby. Montana-Dakota requested an increase of \$849,745 in additional revenues. Only non-gas related or distribution costs are a part of the filing.

Montana-Dakota's non-gas rates for its East River customers have not increased since the initial rates were implemented in August 1993. The primary reasons for Montana-Dakota's rate filing are increased operating expenses (operation and maintenance costs, depreciation and taxes other than income), an increase in the investment in facilities used to provide natural gas service to customers and because volume levels have been significantly lower than authorized in the initial rates established almost twelve years ago.

Along with the proposed increase in rates, new rate structures have also been recommended. Currently, all East River customers are taking service under one rate – East River Natural Gas System Rate 66. Montana-Dakota is proposing two separate rates, Residential Gas Service Rate 66 and a Firm General Gas Service Rate 76. This rate separation will better reflect the services available under each rate class. If approved by the Commission, an average residential customer using 61 dk per year would see an increase of approximately \$9.10 per month.

A Distribution Delivery Stabilization Mechanism (DDSM) is also being proposed for all East River customers. The DDSM is an adjustment designed to balance the fluctuations in weather affecting both the customers and the Company during the winter heating season identified as October 1 through April 30.

| Comparison of Residential Rates | | | | |
|---------------------------------|---------|---------|----------|----------|
| Present Proposed Amount of | | | | % |
| Dk | Rate | Rate | Increase | Increase |
| 3 | \$30.61 | \$38.27 | \$7.66 | 25.02% |
| 5 | 49.68 | 58.72 | 9.04 | 18.20% |
| 10 | 97.36 | 109.84 | 12.48 | 12.82% |
| 15 | 145.04 | 160.96 | 15.92 | 10.98% |
| 18 | 173.65 | 191.63 | 17.98 | 10.35% |
| 20 | 192.72 | 212.08 | 19.36 | 10.05% |

For further information, applicable rates, rules and regulations are on file at Montana-Dakota's offices and are available for inspection upon request.