## MONTANA-DAKOTA UTILITIES CO. SOUTH DAKOTA PUBLIC UTILITIES COMMISSION SET 1 DATA REQUESTS ISSUED NOVEMBER 3, 2020 RESPONSES DUE NOVEMBER 17, 2020 DOCKET NO. EL20-028

1-4. Has MDU considered having separate rates for winter and summer for Rate 95 and Rate 96? Has MDU considered having separate rates for on-peak and off-peak for Rate 95? Explain.

## **MDU Response:**

The Company has not considered separate rates for winter and summer under either Rates 95 or 96, nor has it considered a change to Rate 95 to establish separate rates for on-peak and offpeak. The Company's production costing model (PLEXOS) does incorporate the time of day and season when determining the lambdas included in Attachment A page 1. Rate 95's energy payment reflects the total average lambda for 2021 as the rate schedule is for the occasional purchase of power, regardless of time or season. Rate 96's energy payment is time differentiated; however, the resulting energy payments today (both under the current and proposed Rate 96 schedule) reflect very little difference between the Company's on and offpeak periods. The current rate differential under Rate 96 between on and off peak is  $(0.02\phi)$  per Kwh with the proposed differential  $(0.073\phi)$  per Kwh. With such a small rate differential between the on and off peak lambdas and very little customer participation under either rate, the Company does not believe a change in rate structure is warranted at this time.