

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

October 12, 2022

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

Re: Docket No. EL22-\_\_\_\_\_  
2023 Avoided Costs Rate Update

Dear Ms. Van Gerpen:

In accordance with South Dakota Codified Laws, Chapter 49-34A, Montana-Dakota Utilities Co. (Montana-Dakota) herewith electronically submits for Commission approval revisions to the Company's Occasional Power Purchase Non-Time Differentiated Rate 95 and Power Purchase Rate 96 tariff sheets. 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.

Montana-Dakota requests approval of the following revised tariff sheets:

- 7<sup>th</sup> Revised Sheet No. 35
- 7<sup>th</sup> Revised Sheet No. 36

The methodology used to develop the proposed energy payments is consistent with the approved avoided cost rates. The proposed energy payments for Rates 95 and 96 were generated using Montana-Dakota's production costing model PLEXOS® for Power Systems (PLEXOS), reflecting a test year of calendar year 2023. The proposed energy payments under Rates 95 and 96 reflect an increase in the energy payment per Kwh attributable to an increase in the forecasted Midcontinent Independent System Operator, Inc.'s (MISO) market prices from those included in the currently approved energy payments.

Montana-Dakota has adequate capacity through 2025 with minimal purchases required through 2030 that can be met with purchases through the MISO capacity auction or bi-lateral purchase agreements from a neighboring utility. The 2021 Montana-Dakota Integrated Resource Plan discusses a power purchase agreement of capacity and

energy that Montana-Dakota has entered into with a neighboring utility through May of 2026 which fills an identified capacity shortfall between the retirement of Lewis & Clark 1, Heskett 1 and Heskett 2 coal fired generating units and the construction of the Heskett 4 simple cycle combustion turbine. In addition, Montana-Dakota has entered into an agreement with CPower to expand the current Commercial Demand Response Agreement for a five-year period (through May 31, 2027) and increasing the program to a maximum potential of 50 MW. As noted above the minimal capacity purchases required through 2030 can be met with purchases through the MISO capacity auction or purchases from a neighboring utility. As such, the capacity payment rate included in the Rate 96 tariff is the MISO capacity auction price for Zone 1, the pricing zone for Montana-Dakota, through 2030. The current MISO clearing price is \$7.20 per kWmonth.

The workpapers supporting the proposed energy and capacity payments are provided in Attachment A.

The proposed metering charges for Rates 95 and 96 reflect updated meter costs, including the carrying charge and maintenance expenses. The workpapers supporting the proposed metering charges are provided in Attachment B.

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. The maximum generation received by the Company during any given month over the course of the previous twelve-month period was 1,548 Kwh with generation received by the Company in all twelve months. Assuming the same customer load and generation as the past twelve months, the one customer would experience an increase in their energy payments offset by the increase in the metering charge, resulting in a proposed net increase in annual energy payments of \$64. No customers are currently taking service under Rate 96 in South Dakota.

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.

Included as Attachment C is the South Dakota "Report of Tariff Schedule Change" form required pursuant to ARSD 20:10:13:26. Also included as Attachment D 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 E 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.

Montana-Dakota respectfully requests that the rate schedules set forth herein be approved with an effective date of service rendered on and after January 1, 2023. Please refer all inquiries regarding this filing to:

Mr. Travis R. Jacobson  
Director of Regulatory Affairs  
Montana-Dakota Utilities Co.  
400 North Fourth Street  
Bismarck, ND 58501

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

Mr. Brett Koenecke  
May, Adam, Gerdes & Thompson  
503 South Pierre Street  
P.O. Box 160  
Pierre, South Dakota 57501-0160

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.

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

Attachments