

April 16, 2009

RECEIVED

APR 17 2009

Executive Secretary  
North Dakota Public Service Commission  
State Capitol Building  
Bismarck, ND 58505-0480

**PUBLIC SERVICE COMMISSION**

Re: Gas Meter Testing  
Waiver of Testing Plan

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc., herewith requests Commission approval of the following gas meter testing plan for calendar year 2009. Montana-Dakota also requests approval to deviate from its Gas Meter Testing Plan approved by the Commission in Case No. I-5083 during this interim period.

Montana-Dakota deviated from its random meter testing program during the period April 1, 2007 through March 31, 2008 as a result of implementing its Automated Meter Reading (AMR) Program. As a result of that project approximately 10,000 meters were removed and replaced throughout Montana-Dakota's service territory and a random sample was not performed during the course of the 2007-2008 typical test period. Removal of the meter groups as part of the AMR project were primarily 1960's and 1970's vintage meters and the removal of these meter groups is expected to improve the overall accuracy and reliability of Montana-Dakota's gas meter population.

Montana-Dakota reported the results of its random testing for the period 2006-2007 on December 12, 2008 where all meters were found to meet the criteria for acceptance, with the exception of the following meter groups.

The meter groups noted below experienced a first year failure with less than 10% of the meters registering less than two percent fast. Montana-Dakota began re-sampling the meters starting in January 2009. Test results will be provided to the Commission by July 1, 2009.

- Meter Lot AL425 - Group 91-95
- Meter Lot ER02 - Group 81-85

As also reported in the December 12, 2008 report, the following meter groups

experienced a first year failure with more than 10% of the meters registering more than two percent fast or a second year failure. As of April 1, 2009 97% of the 2,312 meters associated with these meter groups have been removed from service. The Company is diligently working to remove the remaining 3% but delays have been caused by the inability to reach the customer and schedule a time to remove the meter. In some cases the last resort will be to discontinue service in order to do the meter change-out.

- Meter Lot ER02 - Group 71-75
- Meter Lot ER03 - Group 76-80
- Meter Lot ER03 - Group 81-85

The random sampling program described in the Company's meter testing program will be reinstated in 2009 with testing completed by April 1, 2010 and results reported by July 1, 2010. Montana-Dakota will report the results of all other meter tests prescribed in the meter testing program by July 1, 2009.

Montana-Dakota appreciates the Commission's consideration of this post-AMR deployment gas meter testing plan that will efficiently enhance meter accuracies with the removal of the older vintage meter groups. Montana-Dakota personnel are available to discuss the above plan in further detail with the Commission and Commission Staff.

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,



Donald R. Ball  
Vice President-Regulatory Affairs

Attachment