



# MONTANA-DAKOTA

UTILITIES CO.

A Division of MDU Resources Group, Inc.

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

June 21, 2010

**RECEIVED**

JUN 22 2010

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

**PUBLIC SERVICE COMMISSION**

Re: Northern States Power Company  
Aggregator of Retail Customers Investigation  
Case No. PU-10-59

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc., herewith submits this letter in support of Northern States Power Company's (NSP) request for Commission action prohibiting the operation of Aggregators of Retail Customers (ARCs).

The final ARC rule issued by the Federal Energy Regulatory Commission (Order 719) provides different rules for utilities that distributed 4 million megawatt-hours or less in the previous fiscal year (small utility) than is applicable to those utilities that distributed more than 4 million megawatt-hours in the previous fiscal year. Montana-Dakota fits the definition of a smaller utility where ARCs can only aggregate demand response for customers, if the relevant regulatory authority permits such action. This is unlike the rules that apply to utilities such as NSP that do not meet the small utility category where MISO must accept bids from ARCs that aggregate the demand response of customers unless this Commission prohibits operation of ARCs in North Dakota.

Montana-Dakota supports NSPs request that the Commission take affirmative action necessary to prohibit the operation of ARCs in the state of North Dakota in order to protect the interest of its customers.

If you have any questions, please contact me at (701) 222-7856 or Dan Kuntz, Associate General Counsel, at (701) 530-1016.

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  
Pricing & Tariff Manager

Cc: Dan Kuntz

12 PU-10-59 Filed: 6/22/2010 Pages: 1  
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