

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Montana-Dakota Utilities Co.
Wind Farm Station Service – Wishek, ND
Public Convenience & Necessity

Case No: PU-25-261

**MDU RESPONSES TO KEM ELECTRIC COOPERATIVE, INC.'S SECOND SET OF
DATA REQUESTS TO MONTANA-DAKOTA UTILITIES CO.**

Montana-Dakota Utilities Co. ("MDU") hereby provides the following objections and responses to KEM Electric Cooperative, Inc.'s Second Set of Data Requests:

1. *Identify each service provided by MDU within 6,000 feet of the requested delivery point at issue in this matter, excluding the Wishek substation from which service is being requested.*

OBJECTION: MDU objects to this request to the extent it requires MDU to provide confidential client information. MDU objects to this request to the extent that it is vague and ambiguous with respect to what is meant by "service."

MDU RESPONSE: Subject to the foregoing objection, please see MDU's response to DR 15 on KEM's First Set of Discovery.

2. *Are any of the MDU services identified in your response to No. 1 above adequate to provide retail electric service to the Badger Wind load? If so, identify which one(s) would be adequate to provide retail electric service to the Badger Wind load.*

OBJECTION: MDU objects to this request to the extent it requires MDU to provide confidential client information. MDU objects to this request to the extent that it is vague and ambiguous with respect to what is meant by "service." MDU further objects to this request as irrelevant as MDU proposes to use the Wishek substation to serve the load.

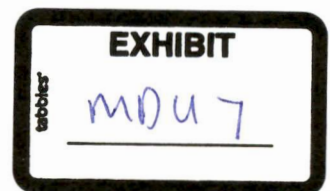
MDU RESPONSE: Subject to the foregoing objection, please see response to DR 1 above.

3. *How much annual revenue does MDU expect to receive from servicing the load at issue?*

MDU RESPONSE: Please see the response to DR 27 of KEM's First Set of Discovery.

4. *How much in annual expenditures on transmission service does MDU expect to incur to serve the load at issue?*

MDU RESPONSE: Please see the response to DR 28 of KEM's First Set of Discovery.



5. *What other costs and revenues not previously identified would also be included in MDU's service of the load at issue?*

MDU RESPONSE: Please see the response to DR 4, above.

6. *What existing rate would MDU charge the load? Identify the appropriate rate schedule for service to the load at issue. Please provide a copy of such rate schedule or a link to where it is available electronically.*

MDU RESPONSE: Please see response to DR 30 of KEM's First Set of Discovery.

7. *If MDU were unable to place a meter in the Wishek substation:*

- a. *What alternatives would MDU have for providing retail service to the load at issue?*
- b. *What would the capital upgrades cost MDU to serve the load at issue using the alternative plan in (a)?*
- c. *Would MDU expect to receive the same revenue from serving the load at issue in that scenario?*

MDU RESPONSE: MDU disagrees with the premise of the question since MDU owns the existing wind generation meter that would be used to meter service.

Dated: July 29, 2026

DORSEY & WHITNEY LLP

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