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

September 1, 2011

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

> Re: Revised Draft Rules for Dockets RM09-002 and RM10-001

Dear Ms. Van Gerpen:

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc., appreciates the opportunity to provide comments regarding the proposed administrative rule revisions transmitted on August 4, 2011. Montana-Dakota electronically submits the following comments regarding the proposed rule revisions:

Proposed Rule 20:10:17:09.01 - regarding the time frame for undercharge payments and in particular the requirement that customers repay the amount billed in an undercharge situation in a period strictly defined in the proposed rule as two times the number of months undercharged. Montana-Dakota requests that the Commission consider a less stringent requirement so that the Company may provide customers with a repayment plan (either shorter or longer) dependent upon each particular situation taking into consideration the length of the error and the undercharge amount to be recovered.

Montana-Dakota does not have any comments to offer regarding the other proposed rule revisions transmitted on August 4. Please contact me if you have any questions.

Sincerely,

Is/ Tamie A. Aberle

Tamie A. Aberle Regulatory Affairs Manager