1	STATE OF NEW HAMPSHIRE
2	PUBLIC UTILITIES COMMISSION
3	
4	October 20, 2011 - 10:07 a.m.
5	Concord, New Hampshire NHPUC OCT 27'11 PM 3:36
6	RE: DG 11-207
7	NORTHERN UTILITIES, INC. 2011-2012 Winter Period Cost of Gas
8	Adjustment.
9	
10	
11	PRESENT: Chairman Thomas B. Getz, Presiding Commissioner Clifton C. Below
12	
13	Sandy Deno, Clerk
14	
15	APPEARANCES: Reptg. Northern Utilities, Inc.: Susan S. Geiger, Esq. (Orr & Reno)
16	Reptg. Residential Ratepayers:
17	Meredith Hatfield, Esq., Consumer Advocate Donna McFarland
18	Office of Consumer Advocate
19	Reptg. PUC Staff: Alexander Speidel, Esq.
20	
21	
22	
23	Court Reporter: Steven E. Patnaude, LCR No. 52
24	



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1 PROCEEDING

CHAIRMAN GETZ: Okay. Good morning, everyone. We'll open the hearing in Docket DG 11-207. On September 15, 2011, Northern Utilities filed its cost of gas rates for the winter period November 1, 2011 through April 30, 2012, its Local Distribution Adjustment Clause charges, and certain supplier charges for the period November 1, 2011 through October 31, 2012. The proposed residential COG is \$1.1149 per therm, a 1.68 cents per therm decrease from last winter.

We issued an order of notice on September 21 setting the hearing for this morning. I also note for the record that the Office of Consumer Advocate has filed its notice of participation and the affidavit of publication has been filed.

So, let's take appearances please.

MS. GEIGER: Yes. Good morning, Mr. Chairman and Commissioner Below. I'm Susan Geiger, from

the law firm of Orr & Reno, representing Northern
Utilities, Inc. And, with me this morning at counsel
table, to my immediate right is Mr. Joe Conneely, and then

Mr. Chris Kahl, Mr. Fran Wells, and Mr. George Simmons.

CHAIRMAN GETZ: Good morning.

MS. HATFIELD: Good morning,

5

1	Commissioners. Meredith Hatfield, for the office of	
2	Consumer Advocate, on behalf of residential ratepayers.	
3	And, with me for the Office is Donna McFarland.	
4	CHAIRMAN GETZ: Good morning.	
5	MR. SPEIDEL: Good morning,	
6	Commissioners. Alexander Speidel, for Staff. And, I also	
7	have with me Bob Wyatt and Steve Frink for Staff.	
8	CHAIRMAN GETZ: Good morning.	
9	MR. SPEIDEL: Good morning.	
10	CHAIRMAN GETZ: Anything we need to	
11	address before the Company presents its witnesses?	
12	MS. GEIGER: I don't think so.	
13	CHAIRMAN GETZ: Hearing nothing, then,	
14	Ms. Geiger.	
15	MS. GEIGER: Yes. Thank you, Mr.	
16	Chairman. Northern would call as a panel three witnesses	
17	this morning; Mr. Conneely, Mr. Kahl, and Mr. Wells.	
18	(Whereupon Joseph F. Conneely,	
19	Christopher A. Kahl, and	
20	Francis X. Wells were duly sworn by the	
21	Court Reporter.)	
22	JOSEPH F. CONNEELY, SWORN	
23	CHRISTOPHER A. KAHL, SWORN	
24	FRANCIS X. WELLS SWORN	

1 DIRECT EXAMINATION

- 2 BY MS. GEIGER:
- Q. I'd like to begin with Mr. Kahl, please. And, Mr.
- 4 Kahl, could you please state your name for the record.
- 5 A. (Kahl) Christopher Kahl.
- Q. And, where are you employed and what position do you hold?
- 8 A. (Kahl) I'm a Senior Regulatory Analyst with Unitil 9 Services Corp.
- 10 Q. And, have you ever testified before this Commission?
- 11 A. (Kahl) I have not testified before this Commission.
- 12 However, I have testified before the Federal Energy
- 13 Regulatory Commission, the Maine Public Utilities
- Commission, and the Massachusetts Department of Public
- 15 Utilities.
- 16 Q. And, in the light of the fact that you haven't
- testified before the Commission here in New Hampshire,
- could you very, very briefly summarize your background
- 19 and experience.
- 20 A. (Kahl) I have been involved with the natural gas
- 21 industry for about 20 years. I've been working with
- 22 Unitil since February of 2011, before that, as a Supply
- 23 Planning Analyst for Bay State Gas, which is now known
- 24 as Columbia Gas of Massachusetts. I was there for

- 1 about thirteen years. Before that, I was with 2 Algonquin Gas Transmission Company. And, about four 3 years before that, I was with DRI/McGraw-Hill, a consulting firm, for about five years. 4 5 Q. Thank you, Mr. Kahl. Now, I'd like to show you a 6 document that I have asked the Clerk to prefile for identification in this docket as "Exhibit Number 1". 7 It's called "Northern Utilities, Inc. New Hampshire 8 9 Division Cost of Gas Adjustment Filing Winter Season 10 2011-2012". Did you assist in preparing that document? 11 (Kahl) I did. Α. MS. GEIGER: And, Mr. Chairman, I would 12 13 ask that this be marked as "Exhibit 1" for identification. 14 CHAIRMAN GETZ: So marked. 15 (The document, as described, was 16 herewith marked as **Exhibit 1** for 17 identification.) 18 BY MS. GEIGER: 19 Q. And, you've identified the document, Mr. Kahl, and 20 you've indicated, I believe, that you assisted in 21 preparing it, is that correct?
- 22 A. (Kahl) That's correct.
- Q. Now, there is another document that I've asked the Clerk to premark for identification as "Exhibit 2".

```
1
          And, it is entitled "Northern Utilities, Inc. Revised
          Winter 2011-2012 Cost of Gas and Associated Charges
 2
 3
          Filing". Could you please identify this document.
          What is it? I mean, what --
 4
 5
          (Kahl) That is our revised cost of gas filing, with
 6
          updated commodity and demand costs.
 7
          And, in addition to updated commodities and demand
     Q.
          costs, are there any other reasons for preparing the
 8
 9
          revised filing?
10
          (Kahl) I had included some supplemental testimony,
11
          which identified some inaccuracies in the initial
          filing, in the testimony only, not in the numbers.
12
13
          I did identify that. And, then, I provided, in that
14
          supplemental testimony, also just a brief, very brief
15
          summary of some of the changes between the initial
16
          filing and the revised filing.
17
          And, is that --
     Q.
18
                         MS. GEIGER: First, Mr. Chairman, I'd
       like to have the document that Mr. Kahl most recently
19
       identified marked as "Exhibit 2" for identification.
20
21
                         CHAIRMAN GETZ:
                                        So marked.
22
                         (The document, as described, was
23
                         herewith marked as Exhibit 2 for
24
                         identification.)
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- 1 MS. GEIGER: Thank you.
- 2 BY MS. GEIGER:
- Q. Now, you've indicated, Mr. Kahl, that you submitted prefiled testimony in this docket, is that correct?
- 5 A. (Kahl) Yes.
- 6 Q. Okay. And, you also submitted supplemental prefiled?
- 7 A. (Kahl) Yes.
- Q. Okay. And, the supplemental prefiled testimony that you've submitted, I believe you've indicated that's contained in Exhibit 2, correct?
- 11 A. (Kahl) Yes.

- Q. Okay. And, what was the purpose of that supplemental prefiled testimony?
- 14 (Kahl) Yes. The supplemental testimony did identify --15 it had two purposes. It did identify a few 16 inaccuracies with the initial testimony. So, some of 17 the numbers in that testimony weren't matching up with 18 the tables. So, there was an addendum in the 19 supplemental or to the supplemental that identified 20 The supplemental testimony also provided a 21 basic overview, basic summary of the change between the supplemental rates that were derived and the initial 22 23 rates that were derived.
 - Q. And, that addendum that you just referenced to your

- 1 supplemental prefiled testimony, does that contain a
- 2 list of all of the changes that have occurred as the
- 3 result -- changes to your original prefiled testimony
- 4 that occur as a result of the revised filing?
- 5 A. (Kahl) Yes.
- 6 Q. And, is that addendum marked or labeled "Attachment
- 7 CAK-1"?
- 8 A. (Kahl) Yes.
- 9 Q. Okay. Do you have any corrections or updates to your
- 10 supplemental prefiled testimony?
- 11 A. (Kahl) I do have one. And, I believe that's located on
- 12 Page 3 of my testimony, on Line 10. And, it would be
- the last word, which is "Maine", and that should
- 14 actually say "New Hampshire".
- 15 | Q. Okay. So, you just made one change to your
- supplemental prefiled testimony, changing the word
- 17 "Maine" to "New Hampshire". And, with that change, do
- 18 you adopt under oath today your prefiled testimony, as
- revised by your supplemental prefiled testimony?
- 20 A. (Kahl) I do.
- 21 Q. Okay. Thank you. Do you wish to add anything further
- 22 to that testimony?
- 23 A. (Kahl) I do not.
- Q. Okay. Thank you. Mr. Wells, could you please state

- 1 your name for the record.
- 2 A. (Wells) My name is Francis Wells.
- Q. And, where are you employed and what position do you hold?
- 5 A. (Wells) I am employed by Unitil Service Corp. as the Manager of Gas Supply.
- 7 Q. And, did you prepare prefiled testimony in this docket?
- 8 A. (Wells) I did.
- 9 Q. And, is that prefiled testimony contained under the tab
 10 entitled "Wells Testimony" in the document that's been
- premarked for identification as "Exhibit 1"?
- 12 A. (Wells) Yes.
- Q. Did you submit supplemental prefiled testimony in this docket?
- 15 A. (Wells) Yes.
- Q. And, is that supplemental prefiled testimony contained in the supplemental COG filing that we've premarked for identification as "Exhibit 2"?
- 19 A. (Wells) Yes.
- Q. Okay. And, what was the purpose of your supplemental prefiled testimony?
- A. (Wells) I provided updates to the changes in NYMEX

 prices that had occurred since the initial filing. I

 had also provided updates to demand costs and

- transportation commodity cost estimates due to the
 settlement in the Tennessee rate case that had been
 filed on September 30th. Finally, the demand cost
 estimate reflected updates to TransCanada demand rates
 that were reflective of the National Energy Board of
 Canada's orders on September -- approximately
 September 13th, 2011.
- Q. And, do you have any corrections or updates to your supplemental prefiled testimony?
- 10 A. (Wells) No.
- Q. Okay. And, do you adopt today under oath your prefiled testimony, as revised by your supplemental prefiled testimony?
- 14 A. (Wells) I do.
- Q. Do you have anything further to add to either of those testimonies?
- 17 A. (Wells) No.
- 18 Q. Thank you. Mr. Conneely, could you please state your name for the record.
- 20 A. (Conneely) My name is Joseph F. Conneely.
- Q. Mr. Conneely, where are you employed and what position do you hold?
- 23 A. (Conneely) I work for Unitil Service Corp. as a
 24 Regulatory -- Senior Regulatory Analyst.

13

[WITNESS PANEL: Conneely | Kahl | Wells]

- Q. Okay. Did you prepare prefiled testimony in this
- 2 docket?
- 3 A. (Conneely) Yes.
- 4 Q. And, is that prefiled testimony contained under the tab
- 5 entitled "Conneely Testimony" --
- 6 A. (Conneely) Yes.
- 7 Q. -- in the document that has been premarked for
- 8 identification as "Exhibit 1"?
- 9 A. (Conneely) Yes.
- 10 Q. And, did you also prepare supplemental prefiled
- 11 testimony in this docket?
- 12 A. (Conneely) Yes.
- 13 Q. And, is that supplemental testimony contained in the
- supplemental COG filing that has been premarked for
- identification as "Exhibit 2"?
- 16 A. (Conneely) Yes.
- 17 Q. Okay. What was the purpose of your supplemental
- 18 prefiled testimony?
- 19 A. (Conneely) The purpose of my supplemental prefiled
- 20 testimony was to make corrections to my prefiled
- 21 testimony that results from the Company's revised cost
- of gas filing made on October 17th, 2011.
- 23 Q. Do you have any corrections or updates to your
- 24 supplemental prefiled testimony?

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1
     Α.
          (Conneely) Yes. The sentence at the bottom of Page 2
 2
          and the top of Page 3 of my supplemental prefiled
 3
          testimony should be changed to read "This update does
          not change the RLIAP charge of 0.0056 that was proposed
 4
 5
          on September 15th, 2011 for effect November 1st, 2011."
 6
          I've also prepared "Corrected Schedule 16-RLIAP", which
          contain corrections to the Revised Schedule 16-RLIAP
 7
          submitted with the revised cost of gas filing.
 8
 9
          schedule consists of two pages, only which of -- only
10
          one of which was corrected. That page is Bates stamped
11
          "corrected Page 231 of 263".
                         MS. GEIGER: And, Mr. Chairman, I've
12
13
       provided both the Clerk and Commissioners with copies of
14
       this schedule that Mr. Conneely just referenced. And, I'd
15
       ask that it be marked for identification as "Exhibit 3"?
16
                         CHAIRMAN GETZ:
                                         Okay.
                                                So marked.
17
                         (The document, as described, was
18
                         herewith marked as Exhibit 3 for
                         identification.)
19
20
                         MS. GEIGER:
                                      Thank you.
21
     BY MS. GEIGER:
          Now, with the revisions that you've just indicated, Mr.
22
     Ο.
          Conneely, do you adopt today under oath your prefiled
23
24
          testimony, as revised by your supplemental prefiled
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1 testimony?
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2

17

- A. (Conneely) Yes.
- Q. And, Mr. Conneely, could you please describe briefly
 what the effect of Northern's proposed COG filing would
 be on a monthly bill of a typical residential heating
 customer consuming 50 therms per month.
- 7 (Conneely) Yes. The residential winter cost of gas Α. 8 proposed here is a rate of \$1.08, 1.0837. Revised 9 Schedule 8, starting on Page Bates stamped 162 of 263 10 shows the effect of the revised cost of gas on 11 residential customers. Effects on other customer classes are shown on subsequent pages. A revised -- a 12 13 residential customer using 50 therms monthly is 14 expected to see a decrease of 1.1 percent from last year's winter season gas bill for the same consumption 15 16 level. This is shown on Bates Revised 166 of 263.
 - Q. Thank you, Mr. Conneely. Do you have anything further to add to your testimony?
- 19 A. (Conneely) No.
- Q. And, Mr. Conneely, one final thing. Did you also submit, as part of Northern's filing in this docket, an Environmental Response Cost Report through June 2011, dated September 15th, 2011?
- 24 A. (Conneely) Yes.

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1
                         MS. GEIGER: And, Mr. Chairman, I would
 2
       ask that that report, which has been filed with the
 3
       Commission and submitted to the Clerk, be marked for
       identification as "Exhibit 4"?
 4
 5
                         CHAIRMAN GETZ: So marked.
 6
                         (The document, as described, was
 7
                         herewith marked as Exhibit 4 for
                         identification.)
 8
 9
                         MS. GEIGER: Thank you.
                                                  I have no
10
       further questions for these witnesses. They're available
11
       for cross-examination.
12
                         CHAIRMAN GETZ:
                                         Thank you.
13
       Ms. Hatfield.
14
                         MS. HATFIELD:
                                        Thank you, Mr. Chairman.
15
       Good morning.
16
                         WITNESS WELLS:
                                         Good morning.
17
                           CROSS-EXAMINATION
18
     BY MS. HATFIELD:
19
     Q.
          Mr. Kahl, could you please look at your testimony in
20
          Exhibit 1, your original prefiled testimony.
21
          (Kahl) Are you referring to "Schedule 1", ma'am?
22
          I'm referring to your written prefiled testimony that
     Ο.
23
          you filed on September 15th. And, would you please
24
          turn to Page 3. Beginning on Line -- beginning at Line
```

- 1 12, you discuss Northern's use of a certain lead/lag
- 2 study, and you also discuss the use of a certain bad
- debt number. Do you see that discussion?
- 4 A. (Kahl) Yes, I do.
- 5 Q. And, you also note that those are proposed figures that
- 6 the Company has filed in its pending rate case, is that
- 7 correct?
- 8 A. (Kahl) That is correct.
- 9 Q. And, would you agree that, pending the outcome of the
- 10 rate case, that those numbers may change next year?
- 11 A. (Kahl) Yes. I agree.
- 12 Q. Mr. Conneely, could you please look at your
- supplemental testimony that you filed on October 17th,
- that's part of Exhibit 2. And, would you please turn
- 15 to Page 3. Beginning at Line 4, you start a discussion
- of your proposed change to the Demand Side Management
- or Energy Efficiency Charge, do you see that?
- 18 A. (Conneely) Yes.
- 19 Q. And, on Line 6, you state that "The Company proposes to
- 20 increase the charge." But, when I look at the numbers
- on Line 8, I think you're actually proposing a
- decrease?
- 23 A. (Conneely) Yes. I'm sorry, yes. It is a decrease.
- Q. So, the word "increase" we should change to "decrease"?

- 1 A. (Conneely) Yes.
- Q. Thank you. And, if we -- in order to get the details
- on what the Company is proposing, what schedule of
- 4 yours would we look at?
- 5 A. (Conneely) For DSM, we would look at Schedule 16-DSM,
- Page 3 of 4. I'm sorry, yes. And, that's on the
- 7 revised schedules. It's Revised Page 235 of 263 Bates
- 8 stamp.
- 9 Q. And, Page 3 of that schedule deals with residential
- 10 customers, correct?
- 11 A. (Conneely) It's Page 3 of 4, yes.
- 12 Q. And, then, Page 4 of 4 addresses commercial/industrial
- 13 customers?
- 14 A. (Conneely) Correct.
- 15 Q. Why is the Company proposing to reduce the Efficiency
- 16 Charge?
- 17 A. (Conneely) On Revised Schedule 16-DSM, it has a
- 18 historical record of all the expenditures and income,
- 19 plus interest, for the last 12 months, which provides
- 20 an over or undercollection. Beginning November '11,
- 21 that overcollection --
- 22 (Court reporter interruuption.)
- 23 **CONTINUED BY THE WITNESS:**
- 24 A. (Conneely) Oh, I'm sorry. The overcollection of 29,000

- is the starting point of the calculation for the next months, which is including all collections, costs,
- and shareholder incentives, plus interest, to calculate
- 4 the cost -- or, the rate of 0.0315.
- 5 BY MS. HATFIELD:
- Q. Do you know what the Company's approved 2011 Energy
 Efficiency Program Budget is?
- A. (Conneely) Our Energy Efficiency Group, I would have to speak with them, as they are the ones that provided the numbers here that were used for this forecast.
- Q. If the Commission approves the Company's proposed reduction, do you know what programs would be cut or reduced?
- 14 A. (Conneely) I do not.
- Q. Do you participate in the Company's Energy Efficiency
 Program docket?
- 17 A. (Conneely) I do not.
- 18 Q. Have you reviewed any of the Company's recent filings
 19 that discuss the Company's progress toward its goals
- 20 for 2011?
- 21 A. (Conneely) I have not.
- Q. Do you know what the Company has proposed for 2012 efficiency programs?
- 24 A. (Conneely) When were they proposed?

- 1 Q. The Company made its filing on September 15th.
- 2 A. (Conneely) Of 2011?
- Q. Excuse me, I think it was earlier than that. In September of 2011.
- 5 A. (Conneely) I have not seen that.
- MS. HATFIELD: Mr. Chairman, I'd like to
- 7 approach the witness and just ask him a few questions
- 8 about an efficiency filing. I don't intend to make it an
- 9 exhibit.
- 10 (Atty. Hatfield handing document to
- Witness Conneely.)
- 12 BY MS. HATFIELD:
- Q. Mr. Conneely, can you please identify the document
- based on the title on the first page?
- 15 A. (Conneely) The first page reads: "New Hampshire CORE
- 16 Energy Efficiency Programs NHPUC Docket DE 10-188
- 17 Summary".
- 18 Q. And, then, there is also a header that says "2011
- 19 Quarterly Report". Do you see that?
- 20 A. (Conneely) Yes.
- 21 Q. And, it says "CORE New Hampshire Program Highlights
- January 1 through June 30, 2011". Do you see that?
- 23 A. (Conneely) Yes.
- 24 Q. Would you please turn to Page 12 of this document. Do

- 1 you see, in the left-hand corner, it says "Unitil Gas
- 2 Energy Efficiency Programs"?
- 3 A. (Conneely) Yes.
- 4 Q. And, then, in the first box, under "Program Expenses",
- 5 there are a variety of efficiency programs listed?
- 6 A. (Conneely) Yes.
- 7 Q. And, it includes, for example, "Home Performance with
- 8 ENERGY STAR", "Low Income Weatherization", and "C&I
- 9 Programs"?
- 10 A. (Conneely) I see that.
- 11 Q. Do you see the total budget for 2011 is "\$985,188"?
- 12 A. (Conneely) Yes.
- 13 Q. And, do you see that, as of June 30th, the Company had
- spent 45.4 percent of its budget?
- 15 A. (Conneely) Yes.
- 16 Q. And, do you see that, for the Low Income Weatherization
- Gas Efficiency Program, as of June 30th, the Company
- 18 had spent 74 percent of its budget?
- 19 A. (Conneely) Yes.
- 20 Q. And that, for the next program, which is "C&I Custom"
- 21 Programs", as of June 30th, the Company had spent
- 22 99.2 percent of its budget?
- 23 A. (Conneely) I see that.
- 24 Q. I think you just testified that you don't participate

22

[WITNESS PANEL: Conneely | Kahl | Wells]

- in the CORE Program docket, is that correct?
- 2 A. (Conneely) Correct.
- Q. So, you wouldn't have attended a technical session in that case on September 12th?
- 5 A. (Conneely) Correct.
- Q. But would your colleagues from Unitil in the Efficiency
 Department have attended that meeting?
- 8 A. (Conneely) Yes, they would have.
- 9 Q. Do you -- did they share with you at that time that the
 10 Community Action Agencies indicated that some of the
 11 Low Income Efficiency Programs actually were out of
 12 funds at that time?
- 13 A. (Conneely) That was not communicated.
- 14 Q. I'm not sure which witness would be able to answer
 15 this, but, if you would look at Revised Page 162 of
 16 263, which is a part of Schedule 8 please. Is that for
 17 you, Mr. Conneely?
- 18 A. (Conneely) Sure, I can help you. Yes.
- Q. The top row of this page has a title that says "Typical Usage: therms", do you see that?
- 21 A. (Conneely) Yes.
- Q. And, it lists numbers at the top. Do you see those numbers?
- 24 A. (Conneely) Yes, I do.

- Q. I believe you just testified a few moments ago that the typical usage of a residential heating customer in the
- 3 winter is "50 therms per month", is that correct?
- 4 A. (Conneely) That would be used as a benchmark, industry benchmark, to communicate changes industrywide.
- Q. So, for comparison purposes, from year-to-year on a bill impact?
- 8 A. (Conneely) Correct.
- 9 Q. So, are these numbers on this schedule, are these more indicative of average use or typical use?
- 11 A. (Conneely) These, again, are used as a benchmark from
 12 the industry. So, I would say it may have been typical
 13 at one point.
- 14 Q. So, is the Company seeing declining use over time?
- 15 A. (Conneely) The Company has seen declining use.
- Q. So, where the winter figure here, on this first line, is "932", if it was -- if that number was changed to be
- based on 50 therms per month, what would that number
- 19 look like?
- 20 A. (Conneely) For the winter season?
- 21 Q. Yes.
- 22 A. (Conneely) Around 300.
- Q. And, then, if you look over on the left, in that first column, it's titled "Winter 2011-2012", do you see

- 1 that?
- 2 A. (Conneely) Yes.
- 3 Q. And, it shows the "Customer Charge". And, then, it
- 4 shows -- it says "First 50 units" and then "Over 50
- 5 units", do you see that?
- 6 A. (Conneely) Yes.
- 7 Q. If I look at those numbers associated with those units,
- 8 does that show that the Company has a declining block
- 9 rate design?
- 10 A. (Conneely) Yes.
- 11 Q. And, then, this is where I find your overall cost of
- gas rate, which is around \$1.08 per therm, is that
- 13 correct?
- 14 A. (Conneely) Correct.
- 15 Q. Is anyone on the panel aware that National Grid's
- proposed cost of gas rate is just over 86 cents per
- 17 therm for this winter?
- 18 A. (Wells) No. I was not aware.
- 19 Q. Would you accept that subject to check?
- 20 A. (Wells) Sure.
- 21 Q. Mr. Wells, do you know what might account for that
- 22 pretty significant difference in the therm rate between
- 23 the two companies?
- 24 A. (Wells) I have some ideas. From a demand cost

perspective, you know, what I know of the EnergyNorth portfolio, is that it is primarily Tennessee Gas
Pipeline for pipeline contracts. Those are
significantly less expensive than the pipeline
contracts used to serve the market that Northern
serves. Northern is served -- a significant portion of
our supply is served off of the PNGTS pipeline, which
is -- and which is fed by TransCanada. These pipelines
are much more expensive than Tennessee. And, because
of the -- and due to the location of Northern and its
existing portfolio, I would expect that Northern's cost
of gas to be higher than EnergyNorth's cost of gas for
those reasons.

- Q. Is that something that Northern can look at in terms of making future contracting decisions, in an effort to reduce those costs?
- A. (Wells) That is going to be subject to the physical constraints of our system, to (a) move gas from Tennessee into our markets. You know, I want to remind the Commission, our markets stretch all the way up to Lewiston, Maine. The second is the ability of the Company to be able to contract for additional Tennessee supplies. The other aspect to consider is that capacity into Tennessee's Zone 6 is highly constrained,

1 and not generally available in the marketplace. So, I 2 would agree, boy, wouldn't it be great if we could have 3 less Portland and more Tennessee to serve our particular markets. But there are market 4 5 considerations that will impede our ability to make that kind of a shift. And, there are physical 6 limitations as well. You know, the Northern and the 7 combined Granite and Northern systems, to move gas from 8 9 Tennessee up to all of our markets is going to be -- is 10 going to be limited, due to operational considerations.

Q. Thank you.

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- 12 A. (Wells) You're welcome.
- Q. Mr. Conneely, one question for you about the low income rate. You discuss this in your prefiled testimony on Page 3, and then, in your revised testimony, on Page 2.

 And, you state in your testimony that you are -- the Company is proposing to increase the low income rate, is that correct?
 - A. (Conneely) In the supplemental prefiled testimony, I have that we are increasing it. Today's correction that we submitted to the Commission leaves the rate at 0.0056.
 - Q. But, if I look at your original testimony, in

 Exhibit 1, at Page 3 of 6, you state "Northern is

- proposing to increase [that] rate from 0.0043 to
- 2 0.0056"?
- 3 A. (Conneely) Correct.
- Q. So, the "0.0056" is an increase from what is currently in place?
- 6 A. (Conneely) Yes.
- Q. And, then, further down on Page 3, you note that even though you have an overcollection balance at this time, you believe that, due to an increase in costs and participants, that you still need that increase. Is that right?
- 12 A. (Conneely) Yes.
- MS. HATFIELD: Okay. Thank you, Mr.
- 14 Chairman. I have nothing further.
- 15 CHAIRMAN GETZ: Thank you. Mr. Speidel.
- MR. SPEIDEL: Yes. Thank you, Mr.
- 17 Chairman.
- 18 BY MR. SPEIDEL:
- 19 Q. While we're on the topic of the LDAC rate related to
- low income assistance, Mr. Conneely, perhaps we can
- begin with Fourteenth [Fifteenth?] Revised Page 56,
- 22 Superseding Tariff Page Fifteenth [Fourteenth?] Revised
- 23 Page 56.
- 24 A. (Conneely) This is in the revised filing?

- 1 Q. Yes. That's correct. Exhibit 2.
- 2 A. (Conneely) I'm sorry, on which page?
- Q. That would be Fifteenth Revised Tariff Page 56,
- 4 Superseding Fourteenth Revised Tariff Page 56.
- 5 A. (Conneely) Okay.
- 6 Q. It's roughly, well, it's a little bit more than that,
- but, among the tariff pages, it's about seven pages in,
- 8 about this far in (indicating). And, there's a table
- 9 that reads "Local Delivery Adjustment Clause". Do you
- 10 have it?
- 11 A. (Conneely) Yes. I have it.
- 12 Q. Okay. Well, as Ms. Hatfield mentioned, there has been
- discussion of an update of the RLIAP line item in the
- far left to 56/10,000th of a dollar, or 0059, after the
- decimal point, as it's indicated here. But, in fact,
- the actual update we believe, on the basis of the
- 17 October 19th filing, is to \$0.0056?
- 18 A. (Conneely) Correct.
- 19 Q. Is that correct?
- 20 A. (Conneely) Yes.
- 21 Q. Would you be able to update the tariff pages that are
- 22 affiliated with this change?
- 23 A. (Conneely) Yes. In our compliance filing, we update
- the LDAC page.

- Q. Thank you very much. I guess we can also stick with

 Mr. Conneely. Do you know if the Audit Staff has

 completed its review of the cost of gas reconciliation

 from last winter?
 - A. (Conneely) The Company has not gotten word that they have completed their audit as of yet.

- Q. Are there any issues with last year's result in the Audit Staff's review of the cost of gas reconciliation from the 2010-2011 that you are aware of?
- 10 A. (Conneely) Not that the Company has been notified or aware of.
 - Q. Would you briefly summarize how the proposed LDAC rates compare to last year's, and what are the primary reasons for the changes?
 - A. (Conneely) Yes. The Residential Low Income Assistance Program Charge, the Demand Side Management Charge, and the Environmental Response Cost Rate, the LDAC components, were all updated to include September actual information in the revised filing. With that, the proposed LDAC rate of 0.0422, which is going to be the new LDAC for residential customers after the LDAC has been -- the compliance filing which actually will show 0.0422. This rate is 0.0034 cents lower than last year's rate. And, for the C&I customers, it will be

1 0.0064 lower than last year's rate.

- Q. Now, I notice that there's a proposed reduction in the Environmental Remediation Charge. Have all the MPG sites in New Hampshire for which Northern might be responsible been cleaned up?
- A. (Conneely) After speaking over the last few months with our ERC Group for the ERC filing, there's still some

 MPG site work to be done of, from what I'm hearing, a multiyear commitment, I guess, by Unitil for the remediation of those sites.
- Q. Could you please provide a little description of what categories of environmental remediation expenses

 Northern is incurring? What sorts of types of work?
- A. (Conneely) Yes. It's three sites; Exeter, Rochester, and Somersworth, New Hampshire. In Exeter, the -- what the ongoing project is the storm water outfall into the Swampscott River. Rochester site is about 90 percent complete. And, the Somersworth is about 95 percent complete. All of the invoices and exact descriptions are in the ERC filing, Exhibit 3, I believe.
- Q. Could you provide a description of how much the Company spent on environmental remediation last year and what it expects to spend next year?
- 24 A. (Conneely) From June 2010 through July 2011, the

- Company spent roughly \$121,000. And, I believe they're anticipating to spend about the same for the upcoming calendar year.
 - Q. Has the Company provided the PUC Audit Staff with the supporting documentation for these environmental remediation costs and litigation expenses?
- 7 A. (Conneely) Yes.

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- Q. Has the Audit Staff completed its audit of those environmental remediation and litigation costs and expenses?
- 11 A. (Conneely) I don't believe so, but the Company hasn't been notified.
- Q. How has this situation related to the audit report been addressed in the past?
- 15 A. (Conneely) Can you expand on that?
- Q. Well, when there's been a time lag between the
 submission of the audit-related expense materials and
 the final report of the Audit Staff, how have the
 expenses been collected for?
 - A. (Conneely) Historically, the ERC has been amortized over five years. And, any discrepancies that were found in the audit for the ERC has been reconciled in the next year's ERC filing.
- 24 Q. So, would such a reconciliation be acceptable for the

- 1 Company in this proceeding?
- 2 A. (Conneely) Yes.
- Q. Beginning on Page 2, Line 18, of your supplemental
 testimony in Exhibit 2, you discuss the proposed
 Residential Low Income Assistance Program Rate. Would
 you be able to tell us, Mr. Conneely, if the
 development of this rate is supported in
 Schedule 16-RLIAP, which begins on Bates Page 231?
- 9 A. (Conneely) Yes, that's correct.
- Q. Okay. How was the RLIAP discount applied to the residential heat base rate components in Supplement Number 1, Proposed Second Revised Tariff Page 2, that would be -- that would be the schedule here, roughly about eight or nine pages in from the beginning of the package. There's --
- 16 A. (Conneely) Are you referring to the Second Revised Page 17 2?
- 18 Q. Yes.
- 19 A. (Conneely) I'm sorry, could you repeat the question also.
- Q. How is the RLIAP discount applied to the residential heat base rate components in this page?
- 23 A. (Conneely) Are you talking about the tariff rates?
 24 Under "tariff rates", those line items?

- 1 Q. Yes. There are certain base rate components. You can 2 see there's a customer charge, and then there's an 3 And, you can see there's an item at the bottom, a box that reads "Residential Non-Heating Low Income", 4 5 and the second box from the top reads "Residential 6 Heating Low Income". And, so, the question is, is the 7 RLIAP discount applied to these residential heat base rate components? 8
- 9 A. (Conneely) And, this is for the R-10 customer class, is that where you are?
- 11 Q. Yes. R-10, and also -- Yes. Right.
- 12 A. (Conneely) And R-11?
- 13 Q. Yes.

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- A. (Conneely) The discount was applied in accordance with

 Commission's Order 25,252, in Docket 11-069. The order

 stated that the temporary rate factor charge of 0.0293

 per therm would be applied uniformly to all Northern's

 rate schedules to customer classes. So, it's

 40 percent, including a temporary rate.
 - Q. Thank you. Also, on Page 3 of your supplemental testimony, on Line 18, you reference a change to Northern's ERC rate.
- 23 A. (Conneely) Yes.
- 24 Q. Is the development of this rate supported in the

- Revised Schedule 16-ERC, which begins on Page 237,
 Bates Page 237?
 - A. (Conneely) That's correct.
- Q. Thank you very much, Mr. Conneely. These questions are for Mr. Wells. Did Northern experience any operational problems or supply disruptions during the last year?
- 7 A. (Wells) No, we did not.
- Q. Did the Company experience any unexpected pricingissues regarding supply purchases last winter?
- 10 A. (Wells) No.

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- Q. Could you please briefly summarize any changes in the supply portfolio from what was in place last year?
 - A. (Wells) Certainly. The biggest change is that the FPL and Distrigas peaking contracts, that had been in place for ten years, ended as of October 31st, 2011, of this year, or will end as of this year. They have been replaced with peaking supply contracts that I describe as "Peaking Supply 1", "2", and "3" in my prefiled testimony. Basically, the difference between these two supplies are actually -- it's reduced demand cost and reduced total volume. These benefit our consumers by basically having a better matching our portfolio requirements with -- or, better matching our supply with our requirements, and also at a reduced demand

1 cost.

Secondly, from a portfolio perspective, we have a series of new asset managers that we selected in our spring RFP for the upcoming year. So, we have new asset managers for our W10 supply -- our W10 storage, rather, new asset managers for our Tennessee long-haul storage, and for our Tennessee Niagara, and also a new asset manager for what we call our "Chicago path", it's just a string of transportation contracts stretching from Vector, all the way to Tennessee and Algonquin pipelines.

Basically, these asset management deals are pretty similar in terms and conditions to what we had contracted for previously, just different, you know, different asset management payments and different -- different suppliers.

- Q. Okay. Thank you. In your supplemental testimony, you note that the Tennessee settlement rates have been approved by FERC, and are being inserted into this revised cost of gas filing?
- A. (Wells) I would, without looking at my testimony, the settlement has not been approved by FERC. FERC has given authorization to Tennessee to begin billing the settlement rates.

Q. Okay.

- A. (Wells) And, the important difference being that, in my forecast of both commodity costs and demand costs, I reflect the settlement rates. However, the settlement also calls for refunds back to June 2011, when the rate case went into effect. It does not reflect a refund, because FERC has not -- FERC has only granted authorization to begin billing under the settlement rates as of November 1st. It has not yet ruled on approving the settlement and, therefore, authorizing the refunds.
 - Q. All righty. Now, these capacity rate changes for the Tennessee Gas Pipeline that have at least been integrated on an interim basis, for lack of a better term, are they favorable to ratepayers, when compared to those used in the initial cost of gas filing?
 - A. (Wells) Yes. They do reflect -- the cost of gas, the updated cost of gas reflects overall lower costs due to the fact that there was a settlement put into place.

 To say that another way, Tennessee's proposed rate case would have been a higher overall result than the settlement.
- Q. Were there also changes to the TransCanada rates?
- 24 A. (Wells) Yes. To give a little bit of history, there

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are multiple -- there are multiple cases involving TransCanada that impact this cost of gas. The first is that, on September 13th, Canada's National Energy Board set the 2011 final tolls at a rate that was equal to what had already been in place as interim tolls. as a bit of background, I'm a little new on National Energy Board's process. But, in the U.S., when a pipeline puts in rates, they are put into place subject to refund pretty routinely. In the National Energy Board, their process is a little different. A pipeline needs to file for interim rates, and then they file for final rates. So, it's possible that the interim rates could be substantially different from the final rates. In the case of 2011, the interim rates were put into effect starting in March. And, then, subsequently, what had happened is TransCanada had filed for final rates, which were somewhat higher than the interim rates that were in effect at that time. The National Energy Board determined that they were only going to -they were going to hold the rate at the initially filed interim rate level. So, whereas the initial filing had reflected the proposed final 2011 rates for November and December, the updated filing reflects the actual approved final 2011 rates, which were at the lower

- 1 interim rate levels.
- Q. Thank you. Mr. Kahl, I have a few questions for you.
- In your testimony from the original cost of gas filing,
- 4 which would be Exhibit 1, beginning on Page 3, on Line
- 5 15. You state that the "forecast of Bad Debt expense
- is based on actual experience and not on a fixed
- 7 percentage." Is that correct?
- 8 A. (Kahl) That's correct.
- 9 Q. What is the Bad Debt fixed percentage applied to gas
- 10 costs that the Company is currently allowed to recover
- 11 through the cost of gas?
- 12 A. (Kahl) I have 0.45 percent.
- 13 Q. Thank you.
- 14 A. (Kahl) And, that is of the anticipated direct cost of
- gas. If you look through the summary sheet, plus I
- think there's an allowance for some working capital.
- 17 Q. Okay. Now, Mr. Kahl, did the temporary rate settlement
- approved by the Commission in Docket Number DG 11-069,
- 19 which is Northern's current base rate case, allow for a
- 20 change in the commodity bad debt calculation?
- 21 A. (Kahl) Not explicitly. However, what was proposed in
- 22 that base rate filing was to remove all bad debt that
- was tied to the supply portion and remove that out.
- So, it would only be collected in the cost of gas

- proceeding. So, we do think it is consistent with our initial filing and with the approval of the temporary
- 3 rates. I should also add that the bad debt expense
- 4 would be reconciled.
- Q. So, just to back up a little bit. What would the bad debt expense be if calculated as currently required by
- 7 the Commission?
- 8 A. (Kahl) If we were using the 0.45 percent?
- 9 Q. Yes, I believe so.
- 10 A. (Kahl) I've got about 130,000.
- Q. And, how does that compare to the bad debt expense included in the filing?
- 13 A. (Kahl) It's significantly lower. I believe, in our filing, we're showing about 379,000.
- Q. Okay. As you alluded to this, will next winter's reconciliation of the winter commodity bad debt recoveries and expense reflect the methodology for calculating commodity bad debt as to be determined by the Commission in DG 11-069?
- 20 A. (Kahl) Yes.
- Q. And any overrecovery would be credited back to customers with interest?
- 23 A. (Kahl) Yes.
- Q. Thank you. Without going into specifics, the cost of

- gas working capital calculation is also based on a
- 2 similar structure, in which you'd have a proposed
- 3 change reflected in this cost of gas?
- 4 A. (Kahl) Correct.
- 5 Q. And, it would be resolved and reconciled similarly to
- 6 the cost of gas bad debt element after the final
- 7 determination of the rate case, is that correct?
- 8 A. (Kahl) That's correct.
- 9 Q. Okay. Now, we'll go back to the tariff pages, Mr.
- 10 Kahl. I'm going to the proposed Revised Page 38,
- 11 Forty-Ninth Revised Page 38, about here (indicating) in
- 12 the filing.
- 13 A. (Kahl) Excuse me. Is this in the supplemental filing
- or in the --
- 15 Q. Yes, in the supplemental, Exhibit 2, the revised
- filing. It's approximately seven, eight, nine pages
- 17 in.
- 18 A. (Kahl) Is this "Page 38", you said?
- 19 Q. Yes.
- 20 A. (Kahl) Okay.
- 21 Q. Forty-Ninth Revised Page 38.
- 22 A. (Kahl) Okay.
- 23 Q. Now, you've referred to some bad debt expense in your
- 24 testimony. Is it reflected on this page as a line

1 item?

- A. (Kahl) Yes, it is. Let me elaborate. We do show -- we have a whole section here labeled "Bad Debt". And, what we start out with is what we project for the year our total bad debt will be, that shows \$650,000. We then take the portion that we think will be allocated to the supply function, and that's based on historical, what we've seen over the last 12 months ending July 2012, and what portion of that would be recovered or incurred over the winter period. So, again, based on historical levels. And, we take our reconciliation and add that altogether. And, as you can see, the total is about 379,000.
- Q. Now, is that reconciliation figure, is that presented within the filing that we've received for this cost of gas?
- 17 A. (Kahl) Yes.
- 18 Q. Could you point us to where that is?
- A. (Kahl) In the initial filing, in Schedule 15, and it would be Bate Page 225. And, the bottom right would show the "\$1,935".
 - Q. Thank you. Now, just as a prospective matter, will this bad debt figure be supported clearly in subsequent cost of gas filings?

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     Α.
          (Kahl) Yes.
                       In discussions with Staff, I did realize I
          did not provide sufficient information on how this
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          number is derived, for instance, the bad debt number of
          650,000. You know, that number we had gotten from
 4
 5
          talking with our Billing Department, who know or have
          firsthand knowledge of how much bad debt we will be or
 6
          are incurring. And, speaking with them, tried to get
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          their best estimate for what we thought it would be for
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 9
          this year. Keeping in mind that the last 12 months
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          that we had looked at had roughly $600,000 of bad debt.
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          Because we have a new rate filing, a base rate filing
          going on, costs will be a little bit higher.
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          Therefore, they thought that bad debt would go up at
14
          least for this year. And, so, that was the basis for
          that 650,000. And, as I said, going forward, we will
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          be, you know, supplementing that, those numbers, with
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          how they were derived, where they came from.
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     Q.
          Thank you, Mr. Kahl.
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- (Kahl) Thank you. 19 Α.
- 20 MR. SPEIDEL: All right. No further 21 questions from Staff for the witnesses.
- 22 CHAIRMAN GETZ: Thank you.
- 23 BY CMSR. BELOW:
- 24 I was wondering if any of you know the mean or median Q.

- consumption in therms for any of the different classes
 of residential customers by either winter or summer
 season?
- A. (Wells) I can handle that, Commissioner. On, and this is weather-normalized, I provide in Attachment 1, I believe it is, to Schedule 10B, on Page 182 of the 263 Bates stamp.
- 8 Q. In the original filing?
- 9 A. (Wells) In the original filing. Yes. I sponsor a

 10 schedule that shows, for residential heat metered

 11 deliveries, if you look at the -- give you a second to

 12 find the page.
- 13 Q. Yes, let me get there. Page 182?
- 14 A. (Wells) 182, correct.
- 15 Q. Okay.
- A. (Wells) It is labeled "Meter Distribution Deliveries and Meter Counts". And, this is for residential heat metered customers.
- 19 Q. Okay.
- A. (Wells) So, this is -- well, this is total distribution
 deliveries. Although, because I also provide this for
 C&I metered customers, I just want to point out, this
 schedule is total distribution, not just our sales
 service customers. But residential heat metered

1 customers, if you look at the last block, it says 2 "Total Division Use Per Meter", for the last year of 3 complete data for 2009-2010, the average annual use, this is in dekatherms, so it's 76.73 dekatherms per 4 5 year. So, about 767 therms per year. You know, we 6 were projecting, it was probably five months -- or, 7 excuse me, it's probably six months actual/six months estimate at the time of this forecast, about 79.01 8 9 annual dekatherms per year, the actual. And, then, the 10 forecast was about 79 dekatherms per year. And, then, 11 I also have that broken out by, you know, just November 12 through April and then just May through October as 13 well, those figures.

- Q. So, this is all residential heat customers, the Tariff
 Rate R-5 and R-6?
- 16 A. (Wells) I believe R-5 and R-6 are residential heat,
 17 correct.
- Q. And, you could -- one could figure the seasonal use by just dividing up the months, splitting up the numbers by groups of months?
- 21 A. (Wells) Actually, I do that on Line 70.
- 22 Q. Oh.
- 23 A. (Wells) So, if you were interested in the winter-only
 24 usage, it's about, you know, our most recently

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          completed winter, and this is weather -- I just want to
          remind myself, this is weather-normalized data, was
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 3
          about 641, call it 642 therms per customer for the
 4
          winter -- for the recently completed winter period.
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     Q.
          Okay. And, do you have any idea how that might compare
 6
          to the median, half above/half below?
 7
          (Wells) I wouldn't be able to tell you --
     Α.
          Okay.
 8
     Q.
 9
          (Wells) -- what the median was.
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                         CMSR. BELOW: Okay. Okay, thanks.
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                         WITNESS WELLS: You're welcome.
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                         CMSR. BELOW: That's all.
                         CHAIRMAN GETZ: Any redirect,
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       Ms. Geiger?
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                         MS. GEIGER: Yes, Mr. Chairman. May I
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      have a moment to approach the witnesses? Thank you.
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                         (Atty. Geiger conferring with the
18
                         witnesses.)
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                         MS. GEIGER: Thank you, Mr. Chairman.
20
       don't have any further questions for the witnesses.
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                         CHAIRMAN GETZ:
                                         Okay.
                                                Then, the
22
       witnesses are excused. Thank you, gentlemen.
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                         WITNESS WELLS: Thank you.
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                         CHAIRMAN GETZ:
                                         Is there any objection
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1 to striking the identifications and admitting the exhibits into evidence? 2 3 (No verbal response) CHAIRMAN GETZ: Hearing no objection, 4 5 they will be admitted into evidence. 6 Are there any issues to address before 7 opportunity for closings? (No verbal response) 8 9 CHAIRMAN GETZ: Hearing nothing, then 10 we'll begin with Ms. Hatfield. 11 MS. HATFIELD: Thank you, Mr. Chairman. The OCA has no objection generally to the Company's 12 13 overall cost of gas proposed rate. And, we note for the 14 record that we have no position on the Company's proposed 15 use of the new lead/lag and bad debt figures, because we 16 understand that the parties will resolve that in the rate 17 case, and we understand that it's reconcilable, if the 18 Commission determines that something other than the 19 Company's proposal is adopted in its final order. 20 With respect to the Company's proposal 21 to reduce the energy efficiency rates, we do oppose that 22 for several reasons. First, no notice was provided that 23 we're aware of to the parties in DE 10-188, despite the

fact that we had a meeting on September 12th in that

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1 docket, and the Company's filing was made a few days And, we think that changing the budgets for the 2 3 efficiency programs is really a programmatic question that 4 should be addressed by the parties in those dockets. 5 based on information that we have from that other docket, 6 the Company was on -- has been on track to spend its 7 approved budget. There are some areas where they were actually on track to overspend, as I discussed with Mr. 8 9 Conneely during this hearing. And, before the Commission 10 approves a change in the efficiency spending, we would 11 respectfully request that the other parties in the efficiency docket have a chance to weigh in. 12 13 And, then, I would also point out that, 14 based on the Company's filing for its proposed 2012 15 efficiency programs, they are actually requesting an 16 increase in the budget. And, so, that calls into 17 question, for us, you know, just what is their basis for 18 reducing the spending? And, I think Mr. Conneely testified today that he doesn't have the information 19 20 necessary, and he's not familiar with the programs. So, 21 we don't believe the Company has met the burden for reducing spending in that particular area. 22 23 CHAIRMAN GETZ: Okay. Thank you. 24 Mr. Speidel.

MR. SPEIDEL: Thank you, Mr. Chairman. Staff supports the Northern Utilities' proposed revised 2011-2012 peak period cost of gas rates as filed, subject to Audit Staff's review of the filed 2010-2011 peak period cost of gas reconciliation, which should be completed in a few days. No issues of concern are expected to come out of the audit of last winter's reconciliation. If something material should arise, Staff will notify the Commission.

The sales forecast for the 2011-2012 peak period cost of gas was developed in a consistent manner with prior cost of gas forecasts, based primarily on normalized actual sales from the prior year.

The supply plan is based on the principles of least cost planning. And, the direct gas costs are based on actual or hedged prices and projected pricing that reflect market expectations.

The projected commodity bad debt expense and working capital in the filing was calculated using the proposed, rather than a Commission-approved methodology, but the actual commodity bad debt expense and working capital to be recovered through the cost of gas will ultimately reflect the Commission's decision on these matters in the base rate case. There will be a

reconciliation of forecast and actual gas costs for the 2011-12 peak period that will be filed prior to next winter's cost of gas proceeding. And, any concerns that may arise related to the 2011-2012 cost of gas forecast may be raised and addressed in the 2012-2013 peak period cost of gas.

The Company has been active within its pipeline shipper groups, participating in efforts to mitigate the proposed rate increases by the pipeline companies, and that has borne fruit.

The Company's hedging policy has offered and continues to offer some measure of price stability in the commodity portion of the cost of gas rates for customers. Northern's hedging activities supported in this cost of gas forecast appears to be consistent with Commission policy currently in place.

The Local Delivery Adjustment Charge is comprised of a number of surcharges, all of which have been established in other proceedings, with the actual amounts of each determined in these winter cost of gas proceedings and effective for one year. Staff has completed its review of the calculations supporting the proposed LDAC rates, and has found that the rates, as revised and corrected, appear to be correct. Audit Staff

has not quite completed its review of the environmental remediation costs, but does not foresee any material issues.

Based on the updated calculations and supporting schedules for each LDAC component rate adjustment, Staff recommends approval of the proposed LDAC rates effective beginning on service rendered November 1st, 2011. If the Audit Staff finds a material error in its review of the environmental remediation costs, Staff will notify the Commission.

Staff has reviewed the proposed supplier balancing charges and capacity allocator percentages, and charges appear to be accurate and reasonable, based on the updated information, and recommends Commission approval.

Also, we support the Company's proposal for readjustment of the reentry fee as reasonable.

In sum, Staff appreciates the efforts of the Company in this matter and recommends approval of the cost of gas and LDAC rates, subject to the final audits and the reconciliations mentioned. Thank you.

CHAIRMAN GETZ: Thank you. Ms. Geiger.

MS. GEIGER: Yes. Thank you, Mr.

Chairman. Northern respectfully requests that the Commission approve the Company's revised filing for the

upcoming winter season's cost of gas.

The Company is sensitive to the Office of Consumer Advocate's request and position in this case. However, we do not feel that, at the present time, that there should be any change made to the proposed rate for the low income -- or, excuse me, for the Demand Side Management Charge. That charge is decreasing in this docket. And, to the extent that, in the CORE docket, there is discussion and consensus and agreement around changing the budget, which would necessitate a midcourse correction to the rate, then the Company would be amenable to revisiting the DSM charge in the spring COG filing. Thank you.

CHAIRMAN GETZ: Okay. Then, with that, we will close the hearing and take the matter under advisement. Thank you, everyone.

(Whereupon the hearing ended at 11:16 a.m.)