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C.C. DOCKET NO. 04-0779

*Rev* ICC Staff Exhibit No. 17 w/attch

Witness \_\_\_\_\_

Date 5/24/05 Reporter BAP

**REBUTTAL TESTIMONY**

of

**David A. Borden**

**Energy Division**

**Illinois Commerce Commission**

**Northern Illinois Gas Company**

**Proposed General Increase in Rates**

**Docket No. 04-0779**

**May 3, 2005**

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10 Q. Please state your name and business address.

11 A. My name is David A. Borden. My business address is 527 East Capitol Avenue,  
12 Springfield, Illinois, 62701.

13 Q. Are you the same David A. Borden who previously filed Direct testimony in  
14 this proceeding?

15 A. Yes.

#### 16 Purpose of Testimony

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to respond to the direct testimony of  
19 certain intervenors and the rebuttal testimony of Northern Illinois Gas Company  
20 ("Nicor" or the "Company") regarding certain issues addressed in my direct  
21 testimony. Specifically, I address issues regarding gas transportation, Hub  
22 services, and energy efficiency.

#### 23 Customer Select Rider 16 Supplier Withdrawals From Storage

24

25 Q. Please respond to Nicor witness, Mr. Bartlett's rebuttal testimony regarding  
26 your proposed changes to the Customer Select Program. (Nicor Gas  
27 Exhibit 24.0, pp. 30 - 31, I. 665 - 688)

28 A. Mr. Bartlett indicates that my proposal is not appropriate in the context of this

29 proceeding because of the significance of the proposal and because only one  
30 Customer Select marketer is actively participating in the instant proceeding.  
31 Although I agree with Mr. Bartlett's account that previous changes to Customer  
32 Select have taken place as the result of a process in which all program  
33 participants have been involved, the type of change that I am proposing should  
34 give Customer Select suppliers more flexibility because it provides for the use of  
35 storage in a manner that is more consistent with how storage is intended to be  
36 utilized, i.e., as a source to meet peak demands and to hedge against potentially  
37 higher winter gas prices. Thus, it is reasonable to expect that the majority of  
38 Customer Select suppliers would support or not object to my proposal.  
39 Accordingly, the lack of participation in this rate proceeding by some Customer  
40 Select suppliers does not constitute a valid basis to delay implementation of my  
41 proposal.

42  
43 Currently, Customer Select suppliers do not have the basic option of varying  
44 daily withdrawals from storage due to changes in forecasted weather and must  
45 meet these changes from daily deliveries. Given that Customer Select usage is  
46 weather sensitive, I echo the remarks made in the direct testimony of Dominion  
47 Retail, Inc. ("Dominion" or "DRI") that if Nicor provided gas to its sales customer  
48 in a similar manner, the Commission would likely find such purchases imprudent.  
49 (Dominion Retail Company Exhibit 1, p. 7) I recognize that the existing  
50 Customer Select program is the result of a collaborative process to construct

51 appropriate operating parameters, and that it is not unreasonable to attempt to  
52 ease the impact of changes made when possible. I also recognize that it is  
53 important for the Commission to implement changes to Customer Select, when  
54 warranted, that improve the program and encourage the continued participation  
55 by suppliers. I will explain the details of my proposal below, and I recommend its  
56 approval by the Commission in this proceeding. However, if the Commission is  
57 reluctant to make my proposed gradual change to the Customer Select program  
58 during this proceeding, then I recommend that the Commission order a  
59 collaborative process to commence for Customer Select to review storage issues  
60 and implement storage withdrawal requirements that provide for greater daily  
61 flexibility in response to daily changes in weather.

62 **Q. Please describe your proposal for daily withdrawals from storage?**

63 A. My proposal represents a gradual change to the manner in which storage  
64 withdrawals are currently allowed under Customer Select. Currently, Customer  
65 Select suppliers must withdraw the same amount of gas on a daily basis from  
66 storage in a given month. The withdrawal amount varies by month, but there is  
67 no daily variability within a given month as weather changes. Under my  
68 proposal, Customer Select suppliers will have the ability to vary the amount of  
69 gas withdrawn on a daily basis. The daily variability will be determined according  
70 to a formula that attempts to account for daily forecasted changes in the  
71 weather. A Customer Select supplier's daily withdrawals will be limited by the

72 formula, i.e., the supplier will not have complete control over storage usage. I  
73 emphasize this point to make clear that my proposal, while different from the  
74 state of the program today, is a gradual movement toward the greater control  
75 over daily storage withdrawals that is enjoyed today by all other transportation  
76 customers outside of the Customer Select program.

77  
78 My proposal prorates the Company's planned withdrawals from storage in a  
79 given month for a Customer Select supplier to determine planned daily  
80 withdrawals from storage. The daily withdrawals from storage deviate from the  
81 planned daily withdrawals according to daily deviations in the forecasted  
82 weather.

83  
84 A coefficient to determine daily deviations in storage withdrawals due to weather  
85 is determined by taking the difference between the planned system withdrawals  
86 on a design day and planned system withdrawals on an average day in January  
87 and dividing by the difference between heating degree days on a design day and  
88 heating degree days on a normal day in January. The weather coefficient links  
89 withdrawals from storage with daily fluctuations in temperature in a manner that  
90 can be calculated easily by the Company.

91  
92 The weather coefficient is then applied to the forecasted heating degree days on  
93 a given day, less the average heating degree days under normal weather for that

94 same day, and allocated to that supplier based upon their share of system peak  
95 demand. The weather adjusted withdrawals from storage would be provided by  
96 the Company to the Customer Select supplier as part of the existing nomination  
97 process for daily gas deliveries. Any planned withdrawal amount that exceeds  
98 the actual monthly withdrawals for a supplier would be prorated over the  
99 remaining months for that supplier. See ICC Staff Schedule 17.1 for a detailed  
100 presentation of my proposed method for daily storage withdrawals for Customer  
101 Select suppliers. This is the same method that was approved by the  
102 Commission for Peoples Gas' Small Volume Transportation program in Docket  
103 No. 01-0470.

104

105 **Q. Does your proposal for daily withdrawals from storage remove control from**  
106 **the Company over the Company's current method or create unreasonable**  
107 **uncertainty for the Company?**

108 A. Although my proposed change to the current method for daily withdrawals  
109 reduces to some degree the Company's control over daily withdrawals, the  
110 limited change in control under my proposal is reasonable and represents a  
111 gradual movement from the current method. The Company will still determine a  
112 planned amount of withdrawals from storage based on normal weather. As  
113 weather changes, the Company will still be able to determine the amount of  
114 storage withdrawals due to the change in weather because under my proposal  
115 this amount is limited to the formula set forth on ICC Staff Schedule 17.1. The

116 Company is in no worse a situation than it is today in that it relies on daily  
117 weather forecasts to estimate the next day's daily deliveries and withdrawals  
118 from storage across its entire system.

119

120 **Q. Have Customer Select suppliers expressed their opinion regarding your**  
121 **proposal for daily withdrawals from storage?**

122 A. Only one Customer Select supplier, Dominion, is participating in the instant  
123 proceeding, but Dominion is the largest supplier in the Customer Select program.  
124 Dominion witness Mr. Crist indicates support for the approach adopted in the  
125 Peoples case, although he advocates even greater flexibility for managing  
126 withdrawals. (Dominion retail Company Exhibit 1, pp. 4-11) My proposal, which  
127 is the same as that approved in the Peoples case, represents a more gradual  
128 movement toward supplier flexibility than the methods of storage allocation and  
129 withdrawals that are set forth in Mr. Crist's testimony.

130

131 **Q. Do you oppose Dominion's proposal to manage its own storage**  
132 **withdrawals? (Dominion Company Exhibit 1, pp. 4-11)**

133 A. I would have a better sense for the Dominion proposal if there were specific  
134 details provided. It might make sense once it was spelled out in detail, since by  
135 comparison industrial and large commercial transportation customers currently  
136 manage their daily storage withdrawals within the parameters of the Nicor tariffs  
137 and with a much greater degree of flexibility than is provided to Customer Select

138 suppliers. Conceptually it is a goal to move toward, but absent greater detail I  
139 cannot support it now.

140

141 **On System Storage Capacity or Storage Banking Service ("SBS")**

142

143 **Q. Please restate the Company's original proposal regarding SBS and your**  
144 **position in your direct testimony.**

145 A. The Company proposes that SBS capacity be reduced from the current 26 days  
146 of Maximum Daily Contract Quantity ("MDCQ") to 23 days worth of a  
147 transportation customer's MDCQ and that the critical day withdrawal rate be  
148 reduced from 2.3% to 2.1%. The Company's calculation comes from the formula  
149 that was approved in their previous rate case, Docket No. 95-0219. In my  
150 direct testimony, I recommended approval of this proposal absent seeing the  
151 positions of transportation customers that intervened in this case. (ICC Staff  
152 Exhibit 8.0, pp. 9 -10)

153

154 **Q. What is the position of other transportation customers on this issue?**

155 A. Dominion proposes that Customer Select receive 38% of annual storage  
156 capacity. Dominion's proposal base loads actual billed storage for 2004 by  
157 dividing it by 12 months. Dominion changes the base amount for each month by  
158 the difference between actual billed amounts in a month for 2004 and the base  
159 load amount for that month. Dominion uses total withdrawals to arrive at an  
160 allocation percentage to apply to annual storage volumes for 2004. (Dominion

161 Exhibit OSSSC Sch JLC 1.3) Dominion indicates that if the MDCQ approach to  
162 storage allocation is maintained, then the amount should be increased from the  
163 current 26 days to 34 days. (Dominion Company Exhibit 1, pp. 12-14)

164  
165 The Illinois Industrial Energy Consumers ("IIEC") and Constellation New Energy  
166 ("CNE") propose, in the direct testimony of Mr. Rosenberg, that the SBS  
167 allocation of storage be based upon the total top gas capacity of 149.74 BCF  
168 divided by the estimated peak day send out of 5.258 BCF, for an allocation of  
169 28.5 days. Mr. Rosenberg indicates that this should be a minimum allocation  
170 because not all transportation customers will simultaneously remove their  
171 maximum amount of gas from storage. (IIEC/CNE Jt. Exhibit 1, pp. 10-11)

172  
173 Vanguard Energy Services, LLC, ("Vanguard") proposes, in the direct testimony  
174 of Mr. Anderson, that the MDQ be calculated as 26 days. Mr. Anderson uses the  
175 same approach as that proposed by Mr. Rosenberg, resulting in 28.5 days, but  
176 proposes that the allocation remain at its existing level of 26 days. (Vanguard  
177 Exhibit 1, p. 3)

178  
179 **Q. What is your opinion of the transportation customers' proposals for SBS**  
180 **allocation and do you recommend that the Commission accept one of**  
181 **these proposals?**

182 A. The proposals illustrate that there is no one correct answer for allocating storage.  
183 Although the Dominion approach is somewhat appealing because it is equitable  
184 to both sales and Customer Select customers, and is based upon actual use of  
185 storage, I recommend that the Commission maintain the MDQ approach to the  
186 allocation of storage because it links the allocation of storage costs to the use of  
187 storage capacity at peak times.

188  
189 Mr. Rosenberg's proposal to utilize the maximum amount of top gas is  
190 reasonable because it reflects the maximum deliverability of the storage assets,  
191 which is likely to vary less than the Company's estimate of storage withdrawals in  
192 a given year over time. I also agree with Mr. Rosenberg's contention that his  
193 calculation is conservative because it does not reflect diversity in storage  
194 withdrawals between transportation customers.

195  
196 **Q. What is the Company's position regarding Mr. Rosenberg's proposal for**  
197 **the MDCQ for SBS?**

198 A. Nicor witness, Mr. Bartlett, in his rebuttal opposes Mr. Rosenberg's position  
199 because it is based on the summation of non-coincident peaks of each storage  
200 field and that actual deliverability is less, and because Nicor must have the  
201 flexibility to meet extreme deliverability requirements that are beyond its control.

202 (Nicor Gas Exhibit 24.0, pp. 15-16)

203

204 **Q. After considering these positions on SBS, what is your opinion regarding**  
205 **the allocation of storage capacity for SBS?**

206 A. I recommend the use of the coincident peak for working gas in storage to  
207 determine the MDCQ for SBS. I reviewed the historic coincident peak for  
208 working gas in storage provided by the Company in its response to IIEC data  
209 request 4.09, and recommend that the MDCQ be increased from the current 26  
210 days to 27 days.

211

212 **Q. How did you determine that the MDCQ for SBS should be increased from**  
213 **26 to 27?**

214 A. By comparison of the average for the coincident peaks for working gas in storage  
215 from the period 1995-2004. Coincident peak numbers are likely to change over  
216 time so the use of the coincident peak for one specific year may not be  
217 appropriate for the purpose of allocating storage capacity that will remain in  
218 effect for several years. I used the three year, five year, and ten year averages  
219 for coincident peak working gas in storage, each ending in 2004, to determine a  
220 respective MDCQ. The results are as follows:

221

	Coincident Peak Working Gas in Storage (BCF)	MDCQ
Three Year Average Ending 2004	140.73	26.8
Five Year Average Ending 2004	143.37	27.3
Ten Year Average Ending 2004	139.60	26.5

222

223 The MDCQs for each period above are similar and for rounding purposes I  
224 recommend that the MDCQ be set at 27 for SBS. Additional detail that supports  
225 this calculation is set forth on ICC Staff Schedule 17.2.

226

227 **Cycling Requirements**

228

229 **Q. Please comment on Mr. Bartlett's proposal regarding the reductions in**  
230 **critical day withdrawals when a transportation customer fails to meet the**  
231 **November 1<sup>st</sup> requirement for storage balances. (Nicor Gas Exhibit 24.0,**  
232 **pp. 17-18)**

233 **A.** Mr. Bartlett proposes a compromise on this issue that essentially splits the  
234 difference between my position in direct and the Company's position in their  
235 direct testimony. (I acknowledge a calculation error in my direct testimony and  
236 as a result the 12.5% that is set forth on ICC Staff Exhibit 8.0, p. 11, l. 207,  
237 should instead be 11.1%.) Mr. Bartlett's proposal is reasonable, but in the  
238 interest of advocating a gradual change regarding the implementation of the  
239 cycling requirement, I maintain my position in my direct testimony on this issue.  
240 That is to say, the Company currently has no cycling requirement and has  
241 provided transportation service for at least 15 years with no such provision in its  
242 tariffs, so it seems reasonable to me to initially apply a more modest penalty for  
243 noncompliance with such a significant change in the cycling requirement. Since  
244 this is a term and condition of transportation tariffs and does not directly affect  
245 revenue requirement, the Company can petition the Commission in the future for

246 approval on 45 days notice should there be a need to increase the penalty for  
247 non-compliance.

248

249 **Q. Please comment on Mr. Bartlett's rebuttal testimony regarding the**  
250 **proposed cycling requirement that transportation customers have all but**  
251 **10% of their storage balances withdrawn from storage by April 1. (Nicor**  
252 **Gas Exhibit 24.0, pp. 19-20)**

253 A. I opposed this proposal in my direct testimony and continue to oppose this  
254 requirement in my rebuttal. I still do not see the need for this requirement  
255 because it is not apparent that the level will not be met either from transportation  
256 customers on their own or through the Company using excess inventories in  
257 storage to meet system supplies prior to the injection season.

### 258 **Uncollectible Expense**

259 **Q. Please respond to Dominion witness James Crist's direct testimony**  
260 **regarding the collection of uncollectible expense from Customer Select**  
261 **customers? (Dominion Retail Company Exhibit 1, pp. 17 – 18)**

262 A. I agree with Mr. Crist's contention that Customer Select customers should not  
263 pay for the portion of uncollectible expense that is attributable to the gas  
264 commodity portion of the customer's bill. Every supplier incurs uncollectible  
265 expense or has risk for non-payment. When customers switch to Customer  
266 Select or any other transportation tariff they are essentially paying twice for  
267 uncollectible expense that is attributable to the gas commodity portion of the

268 customer's bill through Nicor's recovery that is embedded in base rates and  
269 through the cost of non-payment that is incurred by their supplier. Thus, an  
270 alternative retail gas supplier must be able to absorb Nicor's cost of uncollectible  
271 that is attributable to the gas commodity portion of the customer's bill, in addition  
272 to its own, and still provide gas commodity at a competitive price to customers.  
273 In a market such as Customer Select, where margins are likely to be thin per  
274 customer and per customer acquisition costs high, this additional cost to  
275 suppliers may impair the development of competition. In addition, the recovery  
276 of the uncollectible expense that is attributable to the gas commodity portion of  
277 the customer's bill from any transportation customers is objectionable because  
278 the Company, by definition, does not provide gas supply to transportation  
279 customers. Although I do not agree with Mr. Crist's testimony that this portion of  
280 uncollectible expense should be recovered via Nicor's PGA, I agree that  
281 transportation customers should not pay for this cost that is attributable to the  
282 gas commodity portion of the customer's bill.

283

284 **Q. What is your recommendation regarding the recovery of the portion of**  
285 **uncollectible expense associated with gas supply on the bill from**  
286 **transportation customers?**

287 **A.** I recommend that this amount remain in base rates but that it be allocated only  
288 to sales customers. Staff witness Struck, in his direct testimony, recommends  
289 that uncollectible expense be set at \$30,721,000. (ICC Staff Exhibit 1.0,

290 Schedule 1.01) The Company proposes that 66.6% of uncollectible expense  
291 should be recovered only from sales customers. (Nicor Gas Exhibit 12.0, p. 28,  
292 l. 635) Thus, my proposal is that 66.6% of Staff's recommended uncollectible  
293 expense be recovered from sales customers only and the remaining uncollectible  
294 expense that is associated with the distribution portion of the bill be recovered  
295 from all customers.

296

297 **Q. How would these amounts be allocated to sales and transportation**  
298 **customers?**

299 A. Based upon therm sales by customer class, the actual adjustment is set forth in  
300 the cost study sponsored by Staff witness, Mike Luth. (ICC Staff Schedule 16.4)

301

302 **Working Gas In Storage Capital Costs**

303

304 ~~Q. Please respond to Dominion's proposal that the capital cost recovery for~~  
305 ~~working gas in storage should be recovered from sales customers through~~  
306 ~~the PGA. (Dominion Retail Company Exhibit 1, p. 18)~~

307 ~~A. Although I am not testifying as to the classification of working gas in storage~~  
308 ~~capital costs as appropriate for recovery through the PGA, it is my experience at~~  
309 ~~the Commission that Staff treats this cost as a rate base item and as an item not~~  
310 ~~eligible for recovery through the PGA. Nevertheless, I agree with Mr. Crist's~~  
311 ~~contention that it is not appropriate to recover these costs from Customer Select~~

312 ~~customers. Working gas in storage is gas that is inventoried by the Company for~~  
313 ~~later use by sales customers. Customer Select customers provide their own gas~~  
314 ~~to Nicor for storage purposes and bear the burden of capital costs associated~~  
315 ~~with it. (Customer Select customers are the only transportation customers~~  
316 ~~currently allocated a portion of the capital costs from working gas in storage.) In~~  
317 ~~order to address this issue in a manner consistent with Staff's treatment of the~~  
318 ~~cost as a rate base item, I recommend that the cost no longer be allocated to~~  
319 ~~Customer Select customers and that the full amount be recovered from sales~~  
320 ~~customers via base rates. This requires that the allocation of the capital costs~~  
321 ~~for working gas in storage be made only to sales customers in the embedded~~  
322 ~~cost of service study. The actual adjustment should be made according to~~  
323 ~~customer class share of therms and is set forth in the testimony of Staff witness~~  
324 ~~Luth. (ICC Staff Schedule 16.5)~~

325 **Customer Select Sign-Up Issues**  
326

327 **Q. Please comment on Dominion's proposal that Customer Select suppliers**  
328 **should be required to obtain only the customer's meter number, instead of**  
329 **both the meter and account number on the application that authorizes a**  
330 **customer's switch. (Dominion Retail Company Exhibit 1, pp. 19-20)**

331 **A. Dominion proposes that the customer meter number be used instead of both the**  
332 **meter number and account number to authorize a customer switch. (This is not**  
333 **all of the information required to authorize a switch but just 2 items that appear**

334 redundant.) I agree with Dominion's concern that requiring both the account and  
335 meter numbers is redundant, may be confusing to customers and thus may  
336 increase customer acquisition costs, but I disagree with their proposal to use the  
337 meter number. It is possible that meter numbers may be located in areas that  
338 are accessible to the general public and thus could be obtained by suppliers to  
339 authorize the switch of a customer without the customer's knowledge. If retail  
340 suppliers employ door-to-door representatives to solicit business, then it is  
341 possible that they can gain access to a customer's meter number without their  
342 knowledge. In order to protect against the unauthorized use of a customer's  
343 meter number to switch a customer, to eliminate the apparent redundancy of  
344 information, minimize customer confusion, and to reduce customer acquisition  
345 costs, I recommend that the Company require only the customer account  
346 number instead of both the customer account and meter number.

347 **Energy Efficiency**  
348

349 **Q. Please comment on the Direct testimony of Martin G. Kushler on behalf of**  
350 **the Environmental Law and Policy Center ("ELPC") regarding energy**  
351 **efficiency expenditures and programs.**

352 **A.** The ELPC proposes that the Commission order Nicor to spend \$38 million per  
353 year over five years for energy efficiency programs. The ELPC's 2<sup>nd</sup> best  
354 position is that Nicor spend not less than \$10 million per year (presumably over a  
355 five year period) on energy efficiency programs. Mr. Kushler also proposes that

356 a collaborative process commence whereby a portfolio of energy efficiency  
357 programs can be designed and that the Commission provide over sight,  
358 approval, monitoring, and evaluation of these programs. (ELPC Testimony, pp.  
359 10-11) I agree with Company witness, Mr. Al Harms, that Mr. Kushler's  
360 testimony on this issue lacks the detail required to implement the cost recovery  
361 contemplated. (Nicor Gas Exhibit No. 32.0, p. 43) If the Commission  
362 determines that energy efficiency programs are warranted, then I recommend  
363 that the Commission commence a collaborative process to determine the  
364 programs and details needed for implementation and the amount of money that  
365 is cost justified to spend.

366 **Hub Services**

367  
368

**Q. Please summarize your concerns regarding Hub transactions?**

369 A. I remain opposed to the Company's proposal to provide Hub loans beyond the  
370 120 day restriction that is currently in place and I remain opposed to the  
371 Company's proposal to remove the one year term limitation on Hub contracts.  
372 The Company has withdrawn its proposal to provide firm service through the  
373 Hub, (Nicor Gas Exhibit 24.0, p. 9), so there is no longer a difference between  
374 me and the Company on this issue.

375

376 **Q. Do you agree with Company witness, Mr. Bartlett's claim that neither Staff**  
377 **nor any intervenor questions whether increasing Hub efficiency or**

378 **increasing revenues that can be flowed through the PGA is a benefit to**  
379 **customers? (Nicor Gas Exhibit 24.0, p. 9)**

380 A. I wish that I could share in Mr. Bartlett's certainty regarding Hub transactions and  
381 their potential to benefit customers and unequivocally answer "Yes", but the Hub  
382 transactions are themselves difficult to follow and it is difficult to understand their  
383 total dollar effect on sales customers. In fact, from the Company's response to  
384 Staff data request DB 2.01, the Company expressly states that it does not  
385 calculate the effect of individual Hub transactions on the cost of gas to sales  
386 customers. The difficulty in this stems from the timing of the transactions and  
387 the cost of the gas to the Company at the time that the loan is made when  
388 compared to the expected or future price for gas at the time of delivery (at the  
389 time that the loan is made), and the cost of the gas when it is actually repaid to  
390 the Company. Although I agree with the Company's proposal to flow Hub  
391 revenues through the PGA because they address my concerns in part, I  
392 recognize that it is still possible for Hub loans to result in higher gas costs for  
393 sales customers and so I am opposed to expanding the terms and conditions for  
394 Hub services.

395  
396 Q. **Do you agree with Mr. Bartlett's claim that removing the 120 day limitation**  
397 **on Hub loans and the one year limitation on Hub transactions will result in**  
398 **migration from FERC jurisdictional Hub services to Commission**

399 **jurisdictional Hub services, thus increasing revenues that are credited to**  
400 **the PGA? (Nicor Gas Exhibit 24.0, pp. 9 – 12)**

401 A. No. I disagree with Mr. Bartlett's claim because the underlying assumption is  
402 that revenues from FERC jurisdictional Hub services will not be credited to the  
403 PGA. It is my understanding of Mr. Bartlett's direct testimony, that he  
404 recommends that all net Hub revenues be credited to sales customers through  
405 the PGA, including those generated through FERC jurisdictional transactions.  
406 (Nicor Gas Exhibit 8.0, p. 12) It is my understanding that this is supported by the  
407 testimony of Company witness Mr. Gerald P. O'Connor. (Nicor Gas Exhibit 12.0,  
408 pp. 15-16). If my understanding is correct, then there is no basis for Mr.  
409 Bartlett's argument in rebuttal that migration from FERC jurisdictional to  
410 Commission jurisdictional Hub services will provide greater revenues to credit  
411 through the PGA because it all goes through the PGA regardless of the  
412 regulatory jurisdiction. If my understanding is incorrect, then the question is  
413 where do the revenues from FERC jurisdictional Hub services go because it  
414 appears that the Company is removing them from base rates (where they  
415 currently reside)?

416  
417 **Q. Assume that revenues from FERC jurisdictional Hub services are removed**  
418 **from base rates but are NOT credited through the PGA, what happens to**  
419 **those revenues?**

420 A. It is likely that they are treated below the line and go directly to shareholders. It  
421 is possible that I do not fully understand Mr. Bartlett's remarks in his rebuttal and  
422 I request that this issue be clarified in his surrebuttal testimony. (It is possible  
423 that Mr. Bartlett's discussion refers to a qualitative difference between the FERC  
424 and Commission jurisdictional Hub services that relates to interstate and  
425 intrastate deliveries, but even this does not seem plausible to me because it  
426 implies circumventing the current restrictions on Nicor's Rate 21 that prohibit  
427 redelivery to interstate pipelines.) In any event, if it is the Company's position  
428 that FERC jurisdictional Hub revenues should remain in base rates or be  
429 removed from base rates and NOT credited to the PGA so that they go directly to  
430 shareholders, then I oppose the Company's position(s). If this is the Company's  
431 position, then it should be rejected and the Commission should order that all Hub  
432 net revenues, regardless of their source, be credited to sales customers through  
433 the PGA.

434

435 **Q. If all Hub net revenues are credited to sales customers through the PGA,**  
436 **regardless of the jurisdictional source of the transaction, does it matter**  
437 **whether the terms and conditions between FERC and Commission**  
438 **jurisdictional Hub services are the same?**

439 A. No, at least not in terms of the benefit to sales customers and the 120 day term  
440 restriction on Hub loans and a one year term restriction on other Hub contracts

441 would not cost sales customers lost revenues through the PGA as implied by Mr.

442 Bartlett's rebuttal testimony.

443

444 **Q. Does this conclude your rebuttal testimony?**

445 **A. Yes.**

Staff's Proposal Regarding Weather Sensitive Daily Withdrawals from Storage for  
Customer Select Suppliers:

$X_i$  = total Pool withdrawals for a day in month i

$\Sigma X_i$  = actual Pool withdrawals in month i

C = system storage withdrawal per heating degree-day deviation from normal

$W_i$  = planned Pool withdrawals for month i

$W_{dpi}$  = planned Pool withdrawals for a day in month i

$W_{dd}$  = planned system withdrawals on a design day

$W_{jan}$  = planned system withdrawals on an average January day

$HDD_i$  = total heating degree days under normal weather during month i

$HDD_{dni}$  = average heating degree days per day under normal weather in month i

$HDD_a$  = daily forecasted heating degree days for a given day at O'Hare International  
Airport

$HDD_{jan}$  = average heating degree days per day under normal weather in January

$HDD_{dd}$  = heating degree days on a design day

$HDD_{dev}$  = difference between daily forecasted and average heating degree-days

$MDQ_p$  = Pool maximum daily quantity

$MDQ_s$  = system peak demand

P = storage balance to be prorated over remaining months in withdrawal period

$W_{dpi} = W_i / \# \text{ of days in month } i$

$HDD_{dni} = HDD_i / \# \text{ of days in month } i$

$HDD_{dev} = HDD_a - HDD_{dni}$

$C = (W_{dd} - W_{jan}) / (HDD_{dd} - HDD_{jan})$

$X_i = W_{dpi} + (C * HDD_{dev}) * (MDQ_p / MDQ_s)$

$P = W_i - \Sigma X_i$

STAFF'S PROPOSED MDCQ CALCULATION FOR SBS

Docket No. 04-0779  
ICC Staff Schedule 17.2

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
Year	CP Storage Withdrawals BCF	3 Year Moving Average BCF CP Storage Withdrawals	5 Year Moving Average BCF CP Storage Withdrawals	10 Year Average BCF CP Storage Withdrawals	3 Year Moving Average MDCQ: (C) / (I)	5 Year Moving Average MDCQ: (D) / (I)	10 Year Average MDCQ: (E) / (I)	Peak Day Send out BCF
1995	128.97							
1996	131.32							
1997	137.57	132.62			25.2			
1998	139.21	136.03			25.9			
1999	142.03	139.60	135.82		26.6	25.8		
2000	143.78	141.67	138.78		26.9	26.4		
2001	150.89	145.57	142.70		27.7	27.1		
2002	145.77	146.82	144.34		27.9	27.5		
2003	144.45	147.04	145.39		28.0	27.7		
2004	131.96	140.73	143.37	139.60	26.8	27.3	26.5	5.258