

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Northern Illinois Gas Company, :
Proposed General Increase in Natural : Dkt. 04-0779
Gas Rates. :

**BRIEF ON EXCEPTIONS OF THE
ILLINOIS INDUSTRIAL ENERGY CONSUMERS**

I.

INTRODUCTION

IIEC will address certain elements of the Proposed Order (“PO”), which it believes will require clarification. IIEC will also identify certain conclusions within the Proposed Order with which it must respectfully disagree and, therefore, will recommend be modified.

Specifically, IIEC recommends the following clarifications and modifications:

1. The Proposed Order should be modified to adopt the Coincident Peak (“CP”) method instead of the Average and Peak (“A&P”) method for allocation of distribution mains which are not the subject of the Nicor MDM study.

2. The Proposed Order should be modified to direct that the Modified Distribution Main Study (“MDM”) study be adjusted as recommended by IIEC or adjusted in future cases to better reflect the results of the study.

3. The Proposed Order should clarify that the embedded cost of service study ultimately accepted by the Commission should be the basis for revenue allocation in this proceeding.

4. The Proposed Order should be modified to have the Commission adopt IIEC's recommendations for rate design for SC 76 and SC 77.

5. If the Proposed Order is not modified to accept IIEC's recommendations for the design of SC 76 and SC 77, it should be, at a minimum, clarified to make clear that all rate elements, except the customer charge for SC 76, which the Proposed Order has designated remain at its current level, be increased (or decreased) in proportion to the SC 76 and SC 77 class revenue responsibility, as determined by the embedded cost of service study performed by the Company upon issuance of the Final Order in this case.

6. The Proposed Order should be clarified to make clear Nicor (or the "Company") should make the tariff filing necessary to ensure that all customers, transportation and sales, receive the benefit of HUB revenues, based on a uniform volumetric basis.

7. The Proposed Order should be modified to have the Commission reject the cycling requirement that transportation customers fill their storage to 90% of capacity by November 1.

II.

EXCEPTIONS AND ARGUMENT

A. Costs of Service, Rate Design and Tariff Terms and Conditions

1. Cost of Service Study

a. Embedded Cost of Service Study

The Proposed Order correctly determines that it is appropriate to use an Embedded Cost of Service Study ("ECOSS") instead of the Marginal Cost of Service Study ("MCOSS"). (PO at 93 and 101). The Commission specifically determines the ECOSS should be used to set rates in this proceeding. (PO at 101). The Proposed Order also correctly concludes that the Nicor MDM Study should be used for allocation of distribution mains. However, IIEC respectfully disagrees

with the Proposed Order's use of the A&P method, as opposed to the CP method for allocation of distribution mains, which are not the subject of the study. Also, to the extent that the Commission determines that use of the A&P method is appropriate for any purpose in this proceeding IIEC respectfully takes exception to the Proposed Order's rejection of IIEC's proposal for incorporating the A&P methodology into the MDM study while maintaining the fundamental theme of the MDM study, namely that not all classes use all sizes of mains with the same relative intensity.

b. Adoption of the CP Method

IIEC continues to support the use of the CP method, and oppose the use of the A&P method, for the allocation of the cost of mains, which are not the subject of the MDM Study, and the use of the MDM study without adjustment to incorporate the A&P method. (See IIEC Initial Brief at 12-15, IIEC Reply Brief at 3-15) The Proposed Order accepts the use of the A&P method and the modification of the MDM Study to incorporate the A&P method. (PO at 100-101).

IIEC understands that the Commission has previously accepted the use of the A&P method for the allocation of main costs. However, IIEC continues to remind the Commission that even though mains are used 365 days of the year, they are designed and built to meet demands for gas by customers on the basis of the customer's peak day demand. Meters are also used 365 days a year, but no one has suggested the cost of meters be allocated on basis of average demands. Average demands do not shape transmission or distribution investments. The evidentiary record in this proceeding is clear on this point. (Nicor Ex. 31.0 at 4-5 Lns. 87-97; IIEC Ex. 2.0 at 7-8) Therefore, allocating the cost of mains pursuant to the A&P method on the assumption that the A&P method better reflects cost causation, because it recognizes the role

average demands play in shaping investment in the T&D system is simply incorrect. The Proposed Order suggests that it is IIEC's argument that the Nicor T&D system ". . . would be inadequate if it relied on the A&P method to meet system demand". (PO at 100). The Proposed Order does not find this argument persuasive because the A&P method is an allocation method and is not used for engineering purposes. (PO at 100). IIEC agrees the A&P method is used for allocation and not engineering purposes. However, this fact misses the point.

The point IIEC was attempting to make was that the allocation method selected must bear some logical relationship to how costs are incurred on Nicor's real T&D system. The A&P method does not have such a logical relationship because it implicitly assumes a T&D system Nicor would not design and build. There is a cost causative nexus between the actual T&D system operated and maintained by Nicor and the CP method. There is no such nexus between the system that Nicor has designed and built, and the A&P method. Therefore, the A&P method does not reflect cost causation. As a result, the Proposed Order should be modified to adopt the CP method for the allocation of Main costs, which are not the subject of the MDM study.

c. MDM Study

The Proposed Order adopts a modified version of the MDM study described in the Surrebuttal Testimony of Nicor Witness Heinz. (Nicor Ex. 42.0 at 3-4). This version of the MDM Study incorporates the A&P method by allocating 76.9% of the distribution main investment on the basis of the study and 23.1% on the basis of average demands/throughput. Thus, the modification of the MDM Study incorporates the A&P method, but even this approach, while a significant improvement over the Staff's modification of the MDM study, does not fully preserve the fundamental theme of the method, which is that not all classes use all sizes of mains with the same relative intensity. The allocation of the 23.1% on the basis of throughput makes

no distinction between the size of the main and wrongly assumes that all customers make use of all mains or use all mains with the same relative intensity. However, the record here shows that Rate 77 makes no use at all of the two inch mains and SC 76 customers use only 1% of the two inch mains. (Harms TR 675).

IIEC did not support the use of the A&P method in this proceeding. However, it did recommend an approach which would allow the incorporation of the A&P method into the MDM study, while maintaining the fundamental theme of the study, which is that not all customer classes use the distribution mains with the same level of intensity. IIEC described how this could be done in its initial brief. IIEC pointed out that the original MDM study was a matrix showing how peak day gas use flows through each diameter Main. IIEC suggested that one could also develop a matrix using average day flows through each diameter Main. The A&P MDM allocator could then be the weighted average of the two matrixes. A 76.9% weighting could be given to the peak day matrix and a 23.1% weighting could be given to the average day matrix. This approach would introduce the average day flows into the allocation process without conflicting with the fundamental fact that the results of the MDM study show that all customer classes do not use all sizes of mains with the same intensity. The record contains an example of how this approach for incorporating the A&P method into the MDM study would work. (IIEC Cross Ex.4. Harms Tr. 681-687).

Therefore, if the Commission wishes to use an MDM study which gives recognition to the A&P method, the Proposed Order should be modified to require the use of the approach recommended by IIEC. In the alternative, the Commission should direct the Company to adopt the IIEC approach in its next case, if the A&P method is adopted for allocation of mains in that case.

2. Proposed Language

IIEC recommends that the second full paragraph at page 100 of the Proposed Order and the paragraph beginning at the bottom of page 100 and continuing on page 101 through the first sentence of the first full paragraph on page 101 be deleted and the following language inserted in its place:

The next consideration is whether to use the CP or A&P method to allocate transmission and distribution costs not assigned by the MDM study. IIEC advocates the CP method because it more closely reflects how the transmission and distribution system is designed and built. According to IIEC, the system is designed and built to meet peak day demand, not the average demands assumed in the average portion of the average and peak method. While the Commission recognizes it has approved the use of the A&P method in some recent cases, it also recognizes that in past Nicor cases it has accepted the use of the CP method (Citation). Given that the record evidence in this proceeding clearly establishes that Nicor does not make its decisions on investment in the transmission and distribution system on the basis of average demands, the Commission believes it is appropriate to adopt the use of the CP method in this case. Therefore, it accepts the costs of service study presented by Nicor witness Heintz in his direct testimony. That study reflects the unadjusted version of the MDM study and is the appropriate study for setting rates and establishing class revenue responsibility in this proceeding.

B. Rates, Riders and Other Terms and Conditions

1. SBS Charge

The Proposed Order rejects IIEC's proposal to calculate the per unit Storage Banking Service ("SBS") charge for storage capacity in a manner which reflects the fact that transportation customers do not use all of the storage capacity to which they subscribe. The Proposed Order suggests that IIEC cannot, on the one hand support allocation of storage based on the amount of capacity to which the customers should be entitled and on the other hand

support the calculation of the charge for capacity based on the assumption that customers do not use all the capacity to which they are entitled. (PO at 137).

IIEC still believes it is appropriate to calculate the SBS charge in the manner which gives recognition to the fact that transportation customers do not use all the storage capacity they reserve for the reasons stated in their Initial and Reply Briefs. (IIEC Initial Brief at 22-23, IIEC Reply Brief at 31-33). IIEC requests the Proposed Order be modified to adopt IIEC's recommendation on this issue. In the alternative, the Proposed Order appears to agree with the fact that transportation customers tend to subscribe to greater levels of SBS than required, but does not believe that lowering the SBS charge is the proper response to that situation. (PO at 137). To the extent the Commission believes that lowering the SBS charge is not a proper response to the circumstance under which transportation customers do not use all of the storage capacity to which they subscribe. IIEC requests that the Commission identify the "proper response" so that parties may address this issue in the Company's next case.

2. Proposed Language SBS Charge

IIEC recommends the second and third full paragraphs at page 137 of the Proposed Order be deleted and the following language inserted in its place:

The Commission believes that IIEC's point that transmission customers do not use all of the capacity which they reserve is well taken and that some recognition must be given to that fact in the calculation of the SBS charge. Therefore, the Commission adopts IIEC's recommendation that the SBS charge be determined on the assumption that transportation customers will use only 80% of the storage capacity they reserve.

3. Cycling

The Proposed Order adopts a portion of Nicor's recommendation on cycling requirements. Specifically, the Proposed Order adopts Nicor's recommendation that customers be required to bring their gas in storage to at least 90% of the customer's storage capacity by

November 1 of each year. (PO at 144-145). The Proposed Order reasons that while adoption of this limitation will restrict the flexibility of transportation customers, the limitation is reasonable in light of the importance of storage in the winter season. The Proposed Order also suggests that the limitation will enhance Nicor's ability to provide service without unreasonably burdening transportation customers. (PO at 144).

IIEC respectfully disagrees with the Proposed Order's conclusions. First, as IIEC has noted, storage fields do not read a calendar. Therefore, there is no requirement that storage fields be filled precisely by November 1 of each year. The record shows Nicor has been able to cycle its fields without any cycling requirement for transportation customers. There is no evidence in the record to support the conclusion that Nicor has been unable to provide reliable and adequate service to its sales customers in the absence of such a limitation over the last 15-year period. Absent such evidence, it is difficult to see how service will be enhanced by imposition of the subject limitation. In fact, the record contains evidence suggesting that mandatory cycling requirements could be harmful to sales customers. (IIEC/CNE Ex. 1 at 6-8). Under these circumstances the requirement that transportation customers fill their storage to 90% of capacity by November 1 of each year has not been justified. Therefore, the Proposed Order should be modified to reject the 90% by November 1 Cycling Requirement for the reasons stated above, and for reasons stated in IIEC's initial brief (IIEC entire brief at 24-26).

4. Proposed Language Cycling

IIEC recommends that the third and fourth full paragraphs of page 144 and the partial paragraph at the bottom of page 144 and the top page of 145 be modified to read as follows:¹

¹ The first full paragraph at the top of page 145 would not be needed if IIEC's modification is accepted. If it is not accepted IIEC does not take exception to that language.

IIEC and CNE oppose the proposed cycling targets. Among other things, they argue that the proposals will interfere with the operational needs of transportation customers and that historically Nicor has, and can continue to, cycle its storage fields without imposing this additional burden on Transportation customers. They also argue that the cycling targets are potentially harmful to sales customers and that Nicor has not required the use of cycling targets for the past 15 years to provide reliable service.

Requiring Transportation customers to have their storage capacity filled to 90% by November 1 and emptied to 10% of capacity by April 1, will diminish the flexibility of Transportation customers to utilize storage unnecessarily. Nicor has previously managed to operate its storage fields in the absence of this requirement. The Commission concludes that Nicor has not shown this operational measure will enhance Nicor's ability to provide adequate and reliable service without imposing an unreasonable burden on Transportation customers.

In sum, the record does not support Nicor's proposed requirement that Transportation customers should be required to meet Nicor's proposed cycling requirements. While the Commission does not question Nicor's need to fully cycle its storage fields, it is not clear that Transportation customers, or Nicor for that matter, need to reduce storage volumes to 10% by April 1 or fill 90% of their storage capacity by November 1. The record shows that historically, Nicor has not routinely reduced storage volumes to 10%, or nearly 10%, by April 1. Additionally, the other parties have convinced the Commission that, to the extent Nicor actually needs to reduce the amount of gas in storage after the end of the winter heating season, Nicor should be able to accomplish this without placing this additional withdrawal burden on Transportation customers at this time. Finally, the intervenors raised a legitimate concern that combining a withdrawal target with the injection target might be particularly burdensome for Transportation customers.

5. Level of Rate Increase; Rates 4 & 74; Rates 6 & 76; Rates 7 & 77

a. Rates 6 & 76 and Rates 7 & 77

The Proposed Order does not accept IIEC's recommendation to develop a volumetric distribution charge for Rate 76, differentiated on a seasonal basis. (PO at 156). IIEC made this recommendation for Rate 76 only, not Rate 77, because Rate 76 does not have a demand charge and, therefore, it is important to reflect the cost consequences of winter usage in the volumetric charge. (IIEC Ex. 1 at 30). The IIEC approach was supported by the embedded cost of service study performed by the Company. (IIEC Ex. 1 at 30).

The Proposed Order appears to assume that IIEC made its proposal with regard to Rate 77. IIEC made no such proposal in regard to Rate 77 because Rate 77 has a demand charge. It was the absence of a demand charge for Rate 76, which was the basis for IIEC's proposal in the first instance. Therefore, IIEC respectfully requests the Proposed Order be modified to reflect that IIEC's proposal was made in relation to Rate 76. The Proposed Order should also be modified to adopt IIEC's proposal for the reasons stated above, and for the reasons stated in IIEC's Initial Brief and Reply Brief. (IIEC Initial Brief at 28-29, IIEC Reply Brief at 2).

IIEC wishes to point out that while the Proposed Order correctly notes that the storage costs included in the Rates 4 and 6 distribution charge should be removed to obtain the Rates 74 and 76 distribution charges, which collect storage costs through the SBS charge, the Proposed Order does not specifically reflect the fact that storage costs are also collected through the SBS charge for Rate 77. Therefore, the distribution charge for Rate 77 should also be set at a level which reflects the removal of storage costs that are included in Rate 7. IIEC believes that the ALJs intended this result. Therefore, IIEC sees this recommendation as a clarification of the Proposed Order.

In addition, IIEC believes that in the Proposed Order's discussion of the adjustment to the distribution charge for Rate 76 to remove storage costs, the Proposed Order uses the word "excludes" in the third sentence of the last full paragraph on page 155 of the Proposed Order, that sentence should read:

"The storage costs included in Rate 6 distribution charge should be removed to obtain the Rate 76 charge. Storage costs for Rate 76 are collected through the SBS charge."

Finally, IIEC suggests that while the Proposed Order is correct in concluding the demand charge for Rate 77 should be set on the basis of the embedded cost of service study, IIEC notes

that the Nicor ECOSS presented in Nicor's Direct or Rebuttal or Surrebuttal Testimony will allow the Company to differentiate between demand and customer cost, but it will not establish how to block the Company's two block demand charge or how big the charge in each block should be. IIEC recommended that the Commission maintain the relative relationship between the two blocks by increasing each block in proportion to the class revenue responsibility shown in the appropriate embedded cost of service study in the event of a rate increase. In the event of a total revenue decrease for Rate 77, the tailblock of the demand charge for Rate 77 should remain at its current level. As the Proposed Order notes, Nicor did not object to IIEC's method for determining demand charges in the event an embedded cost of service study was used to determine revenue allocation.

b. Proposed Language Rate 6 & 76

IIEC recommends the last full paragraph on page 155 and the first full paragraph on page 156 of the Proposed Order be modified to read as follows:

The distribution charges for Rates 6 and 76 should be set at a level that will recover the revenue responsibility assigned to those classes. The Commission concurs with Nicor that the distribution charge for Rate 6 should be higher than that for Rate 76. The Commission accepts IIEC's proposal to establish a seasonal volumetric or distribution charge. The storage costs included in the Rate 6 distribution charge should be removed to obtain the Rate 76 charge, which excludes storage costs through the SBS charge. Thus, Nicor is directed to file tariffs that reflect these conclusions for Rates 6 and 76.

For the purpose of this proceeding, the Commission directs Nicor to recalculate its embedded cost of service study, consistent with the other findings in this Order, and to set the customer charge for Rate 7 and Rate 77 at the level consistent with the results of that study. Again, the customer charge for Rate 7 should be \$25.00 per month lower than for Rate 77 for the reasons discussed above. Likewise, the Commission finds that demand charges for Rate 7 & Rate 77 should be identical and reflect the results of the new cost of service study discussed above with the blocks for the demand

charge being set in accordance with IIEC's recommendation. The volumetric charge for Rate 7 and Rate 77 should be set on a residual basis to recover the combined class revenue requirement responsibility. Nicor is directed to file tariffs for Rate 7 and Rate 77 that reflect these conditions.

III.

CONCLUSION

IIEC supports the Proposed Order's resolution of numerous issues in this proceeding. However, IIEC takes exception to the Proposed Order's treatment of a few limited issues regarding the use of the CP method as opposed to the A&P method; the appropriate modification of the MDM Study if the Commission adopts the A&P method; the calculation of the SBS charge; the partial adoption of the Nicor Proposed Cycling requirements; the failure to adopt IIEC's recommendation on a seasonal distribution charge for Rate 76; and clarification of the design of Rate 77. IIEC respectfully suggests that the modifications to the Proposed Order identified above be adopted.

DATED this 26th day of August, 2005.

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PROOF OF SERVICE

I, Eric Robertson, being an attorney admitted to practice in the State of Illinois and one of the attorneys for the Illinois Industrial Energy Consumers, herewith certify that I did on the 26th day of August, 2005, electronically file with the Illinois Commerce Commission, the Brief on Exceptions of IIEC, and electronically served same upon the persons identified on the Commission’s office e-docket service list.

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SUBSCRIBED AND SWORN to before me, a Notary Public, this 26th day of August, 2005.

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