

Direct Testimony

Of

Christopher L. Boggs

Rates Analyst

Rates Department

Financial Analysis Division

Illinois Commerce Commission

Northern Illinois Gas Company

d/b/a Nicor Gas

Proposal to Establish Rider PORCB  
(Purchase of Receivables with Consolidated Billing)

Docket No. 12-0569

March 1, 2013

1 **Q. Please state your name and business address.**

2 A. My name is Christopher L. Boggs and my business address is 527 E. Capitol  
3 Avenue, Springfield, IL 62701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Illinois Commerce Commission (“Commission” or “ICC”) as  
7 a Rate Analyst in the Rates Department of the Financial Analysis Division. My  
8 responsibilities include rate design and cost of service analyses for electric, gas,  
9 water and sewer utilities and the preparation of testimony on rates and rate  
10 related matters.

11

12 **Q. Please discuss your educational and professional background.**

13 A. I received a BS in Economics/Business Administration from Knox College in  
14 1987. I have been employed as a Rate Analyst at the Commission since April of  
15 2008. In my work as a Rate Analyst, I have testified in several rate cases on  
16 issues including rate design, cost of service, tariff language, miscellaneous fees  
17 and rates. Prior to my employment at the ICC, I worked for more than 16 years  
18 in mortgage finance and mortgage operations management.

19

20 **Q. What is the purpose of your direct testimony?**

21 A. The purpose of my testimony is to address the Rider Billing Services Agreement  
22 form and title transfer documents that a Qualifying Alternative Gas Supplier (“Q-  
23 AGS”) would be required to submit prior to Northern Illinois Gas Company  
24 (“Nicor” or the “Company”) commencing service under Rider 17.

25

26 **Q. Are you sponsoring any schedules as part of your testimony?**

27 A. No.

28

29 **Q. In summary, what are your recommendations in this proceeding?**

30 A. I recommend that Nicor develop and present in its rebuttal testimony a sample  
31 template of the Billing Services Agreement (“Agreement”) form that a Q-AGS  
32 would be required to submit to the Company prior to the Company providing  
33 service under Rider 17 *and* a sample template of the title transfer documents to  
34 effectuate the sale of Qualifying Receivables from any Q-AGS to the Company in  
35 accordance with the requirements of Rider 17.

36

37 **Q. Has the Company developed the Billing Services Agreement form**  
38 **referenced in Rider 17, Section A, Number 4, Original Sheet No. 75.9.6 that**  
39 **a Q-AGS must submit to Nicor as a prerequisite of service?**

40 A. No, it has not. I have attached Exhibit 4.1, which is a response to Data Request  
41 (“DR”) CB 1.01 from Company witness Mudra. In his response, Mr. Mudra  
42 indicated that any such Agreement form “will be formulated if the Company’s  
43 proposed Rider 17 is approved,…”

44

45 **Q. How do you assess the Company’s plans to develop the Billing Services**  
46 **Agreement form only if the Commission approves its proposed Rider 17?**

47 A. The Company’s approach is not appropriate. Rider 17 would require a Q-AGS to  
48 submit a completed Billing Services Agreement before receiving service under  
49 Rider 17. Thus, the Billing and Services Agreement constitutes part of the terms  
50 and conditions under which a Q-AGS would receive service under Rider 17. The  
51 Commission should not be precluded from reviewing the substance of the Billing  
52 and Services Agreement, which is effectively part of Rider 17, simply because  
53 the Company has not yet drafted it. It is my opinion that Nicor should have a  
54 sample Billing Services Agreement form drafted and available for review by all  
55 parties to this proceeding in the event that the Commission approves the  
56 Company’s proposed Rider 17.

57

58 **Q. What is your recommendation regarding the Billing Services Agreement**  
59 **form?**

60 A. I recommend that the Company draft a Billing Services Agreement form that it  
61 intends to provide to any Q-AGS to complete as a prerequisite of service under  
62 Rider 17 and provide that draft in its rebuttal testimony. This would allow the  
63 parties to this proceeding and the Commission to evaluate whether that draft  
64 form includes any provisions, in addition to those otherwise set forth in Rider 17  
65 that they might find unreasonable or that should be otherwise modified in the  
66 event the Commission approves the Company's proposed Rider 17.

67

68 **Q. Has the Company developed a draft of the title transfer documents**  
69 **referenced in Rider 17, Section A, Number 5, Original Sheet No. 75.9.6 that**  
70 **the Company may request to effectuate the sale of Qualifying Receivables**  
71 **from a Q-AGS to the Company in accordance with the requirements of**  
72 **Rider 17?**

73 A. No, it has not. I have attached Exhibit 4.2, which is a response to DR CB 1.02  
74 from Company witness Mudra. In his response, Mr. Mudra indicated that "Title  
75 transfer documents and any such templates, if deemed necessary, will be  
76 formulated if the Company's proposed Rider 17 is approved,..."

77

78 **Q. How do you assess the Company's plan to develop the title transfer**  
79 **documents template to effectuate the sale of Qualifying Receivables from**  
80 **any Q-AGS to the Company only if the Commission approves its proposed**  
81 **Rider 17?**

82 A. The Company's approach is not appropriate. As with the Billing Services  
83 Agreement, the Commission and the other parties in this proceeding should not  
84 be precluded from reviewing the template for title transfer documents at the same  
85 time they review Rider 17. A sample title transfer document(s) should be  
86 available for review by all parties to this proceeding in the event that the  
87 Commission approves the Company's proposed Rider 17.

88

89 **Q. What is your recommendation regarding the title transfer documents**  
90 **template to effectuate the sale of Qualifying Receivables from any Q-AGS**  
91 **to the Company?**

92 A. I recommend that the Company provide a sample title transfer document(s) that it  
93 intends to require any Q-AGS to complete to effectuate the sale of Qualifying  
94 Receivables as a prerequisite of service under Rider 17 in its rebuttal testimony.  
95 This would allow the parties to this proceeding and the Commission to evaluate  
96 whether the sample title transfer document(s) include any provisions that should

97 be modified in the event the Commission approves the Company's proposed  
98 Rider 17.

99

100 **Q. Does this conclude your direct testimony?**

101 **A.** Yes, it does.

**Northern Illinois Gas Company d/b/a Nicor Gas Company**  
**Response to: Illinois Commerce Commission**  
**Ill.C.C. Docket No. 12-0569**  
**CB First Set of Data Requests**

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CB 1.01 Q. Please provide a completed Rider Billing Services Agreement form that any and all Q-AGS have submitted prior to Nicor commencing service under this Rider 17. If a Rider Billing Services Agreement form from a Q-AGS has not been provided prior to Nicor commencing service, please provide a detailed explanation as to why not. If no Rider Billing Services Agreement forms have been received, please provide the templates to be used for these forms.

CB 1.01 A. Nicor Gas does not have a completed Rider PORCB Billing Services Agreement form. The Rider PORCB Billing Services Agreement, and any such template, will be formulated if the Company's proposed Rider 17 is approved, and will be dependent upon the final outcome of this proceeding.

*Witness:* Robert R. Mudra

**Northern Illinois Gas Company d/b/a Nicor Gas Company**  
**Response to: Illinois Commerce Commission**  
**Ill.C.C. Docket No. 12-0569**  
**CB First Set of Data Requests**

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CB 1.02 Q. Please provide any and all executed title transfer documents that the Company has requested to effectuate the sale of Qualifying Receivables from any Q-AGS to the Company in accordance with the requirements of this Rider. If an executed title transfer document from a Q-AGS has not been provided in accordance with the requirements of this Rider, please provide a detailed explanation as to why not. If no executed title transfer documents have been received, please provide the templates to be used for these documents.

CB 1.02 A. Nicor Gas does not have executed title transfer documents related to proposed Rider 17. Title transfer documents, and any such templates, if deemed necessary, will be formulated if the Company's proposed Rider 17 is approved, and will be dependent upon the final outcome of this proceeding.

*Witness:* Robert R. Mudra