



RUBIN AND
RUDMAN LLP
Attorneys at Law

T: 617.330.7000 F: 617.439.9556
50 Rowes Wharf, Boston, MA 02110

David C. Fixler
Direct Dial: (617) 330-7099
E-Mail: dfixler@rubinrudman.com

October 16, 2009

Via Federal Express and Electronic Mail

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: National Grid - Annual Gas Cost Recovery Charge Filing - Docket No. 4097

Dear Ms. Massaro:

Enclosed for filing please find an original and nine (9) copies of the Direct Testimony of Rebecca Bachelder on behalf of Direct Energy Services, LLC in the above-captioned proceeding.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

David C. Fixler

DCF/jmh
Enclosure

cc: Thomas R. Teehan, Senior Counsel, National Grid
Leo J. Wold, Special Assistant Attorney General
Service List

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

NATIONAL GRID

DOCKET NO. 4097

DIRECT TESTIMONY

OF

REBECCA BACHELDER

On behalf of Direct Energy Services, LLC

October 16, 2009

1 **I. Qualifications**

2 **Q. Please state your name, affiliation and business address.**

3 A. My name is Rebecca Bachelder. I am President of Blueflame Consulting, LLC. My
4 business address is 80 Warwick Road, Melrose, MA, 02176. I am testifying on behalf of
5 Direct Energy Services, LLC (“Direct”) in this proceeding.

6 **Q. Please describe Blueflame Consulting.**

7 A. I formed Blueflame Consulting in May of 2003 to provide consulting services to
8 unregulated energy marketers and natural gas and electricity customers in the New
9 England market. I have testified and otherwise participated in natural gas regulatory
10 proceedings and worked on supplier/utility operations issues in Connecticut,
11 Massachusetts, Maine, New Hampshire and Rhode Island. A complete list of my
12 appearances and regulatory participation is included as Attachment RSB-1.

13 **Q. Please describe your educational and professional background.**

14 A. I graduated Magna Cum Laude from the University of Massachusetts, Amherst in 1979
15 with a BBA in Finance and a minor in Economics. In 1984, I received a Master of
16 Business Administration from Boston University.

17 Prior to the formation of Blueflame Consulting, I was Director, Legislative and
18 Regulatory Affairs for AllEnergy Gas & Electric Marketing Company, an unregulated
19 natural gas supplier with operations in the northeastern United States. My
20 responsibilities included identifying areas of regulatory or legislative risk and
21 opportunity, and representing AllEnergy in regulatory proceedings and formal or
22 informal meetings with Local Distribution Companies (“LDCs”), to mitigate undue
23 supplier risks, and to promote the competitive market in jurisdictions in New England,

1 New York and New Jersey. I appeared on behalf of AllEnergy in numerous proceedings
2 in Connecticut and Massachusetts, participated in collaborative groups in Connecticut,
3 Massachusetts, New Hampshire and New York, and represented AllEnergy's interests in
4 New Jersey and Rhode Island as well as the aforementioned jurisdictions. I also
5 managed the Customer Care and Billing Departments from 2000 through 2002 in
6 addition to my regulatory responsibilities. I was at AllEnergy from 1997 until 2003.
7 When AllEnergy dissolved in 2003, I opened my consulting practice.

8 Prior to joining AllEnergy, I was employed by Boston Gas for eighteen years in a number
9 of positions. I managed the Rates and Regulatory Group from 1988 through my
10 departure in 1997. In that capacity, I made numerous appearances before the
11 Massachusetts Department of Public Utilities.

12 **II. Purpose of Testimony**

13 **Q. Please discuss the purpose of your testimony in this proceeding.**

14 A. National Grid – Rhode Island (“NGRID”) filed its Annual Gas Cost Recovery (“GCR”)
15 filing on September 1, 2009. In its filing, NGRID determined the pipeline capacity path
16 rates for contractual paths available to marketers for annual assignment. Direct was
17 surprised and concerned by the significant change in the path costs,¹ as presented in
18 Attachment EDA-4 to the Testimony of Elizabeth D. Arangio, at a time when market
19 costs have decreased considerably over the past year. I was retained by Direct to analyze
20 the GCR filing, including an analysis as to the reasons for the significant change in path
21 costs.

¹ See Revised Attachment EDA-4 to Arangio Testimony as provided by NGRID in response to Direct Energy Data Request 1-4, Attachment 2, page 10 of 18. NGRID's original filing presented a WACOG of \$0.999 (Arangio Testimony, Attachment EDA-4, page 10 of 18). NGRID has since revised its WACOG to \$0.963 to correct the NYMEX strip used to make its calculation.

1 **III. Change in Path Costs**

2 **Q. Have you been able to determine the cause(s) for the significant change in path**
3 **costs?**

4 A. After reviewing the Company's testimony, exhibits and responses to data requests, Direct
5 has two significant areas of concern with the filing at this time.² First, NGRID revealed
6 in its response to Direct's Data Request 1-4 that it has changed the methodology used to
7 calculate the basis portion of the path costs. It is my understanding that this came as a
8 complete surprise to Direct. A historical average methodology has been in place since
9 the inception of the capacity release program. Marketers rely on a consistent
10 methodology in order to estimate costs used to price multiple year contracts for
11 customers. Stability in methodologies is important to the competitive market, and before
12 making any changes to ratemaking elements affecting marketers and their customers, it is
13 critical for LDCs to communicate these proposed changes to marketers and discuss the
14 potential impacts with them. It is my understanding that NGRID did not notify Direct of
15 this change in basis estimation methodology which, is a critical cost component for
16 pricing contracts with transportation customers.

17 **Q. How has NGRID changed its methodology?**

18 A. Instead of using a three-year moving average of actual costs as has been used in Rhode
19 Island since Providence Gas Company began releasing capacity paths to marketers,

² On October 14, 2009, I participated in an informal conference with NGRID at which time NGRID agreed to provide additional information and calculations relative to issues addressed in this testimony. On October 16, 2009, NGRID provided additional information and calculations addressing the questions presented by Direct on October 14, 2009. Direct appreciates NGRID's prompt attention to this matter. I have not had an opportunity to review this latest information in detail, and, as such, this testimony does not reflect the additional materials provided by NGRID. When I have had the opportunity to review the materials provided by NGRID in detail, I will supplement this testimony as required.

1 NGRID in this filing is now using a one-year forward looking forecast of prices using the
2 NYMEX strip from August 24, 2009.

3 **Q. Is the forward looking forecast of prices a reasonable methodology?**

4 **A.** While this may be a reasonable methodology for a forecast, it presents significant
5 problems when used for ratemaking purposes. Any ratemaking using a forecast of
6 volatile costs generally reconciles in the future to the actual costs experienced. This is
7 very common for gas cost adjustments that I am familiar with in the industry. These
8 mechanisms use deferred accounting to accumulate any over or under collections
9 compared to actual gas costs. While it may be the case that NGRID is looking for a
10 consistent methodology between jurisdictions for forecasting gas costs, such a
11 methodology should not be used in Rhode Island for basis costs, as Rhode Island is the
12 only jurisdiction using this particular capacity path release program, and a forecast
13 methodology is fraught with problems in this situation.

14 **Q. Are there any other problems with a forward looking methodology?**

15 **A.** Yes; use of forecast data absent a reconciliation feature can produce unwanted
16 subsidization of sales customers by transportation customers or vice versa. The addition
17 of a reconciliation feature, however, would not cure the other defects of the forecast
18 methodology. Although a forecast may be “consistent with market expectations” as
19 stated in NGRID’s response to Direct Energy Data Request 1-4, this change in
20 methodology will likely result in more volatility in the costs from year to year and there
21 is a good chance it will not reflect actual basis costs experienced throughout the year as
22 any deviations in weather compared to normal will impact market prices and basis on the
23 various paths into New England. Further, the paths into NGRID’s service territory

1 contain illiquid points. Looking at the August 24, 2009 prices at these points, different
2 shippers receive different quotes. The spread is very wide because there are not many
3 trades done at these points. Any forecast is likely to be wrong for a given marketer on
4 day one.

5 Price volatility of gas costs is something many commissions have grappled with for sales
6 customers. The Rhode Island Commission has required a hedging program for NGRID
7 to help manage volatility in gas cost pricing. Marketers similarly employ risk
8 management tools for their customers. A volatile basis calculation will thwart those
9 efforts. Attachment RSB-2 to my testimony illustrates the volatility facing marketers
10 with the basis moving target. A three month moving average was used to determine the
11 WACOG and basis differentials from 2005 to date. The difference in basis differentials
12 over this time period ranges from \$0.19 to \$0.26, which is fairly stable. The basis
13 differential for the forecast year jumps to a \$0.62 differential, which is significantly
14 different from what we have experienced in the recent past. A one-year forecast will
15 result in greater year-to-year variances than a three year historical moving average.
16 Year to year price volatility likely will result in unforeseen increases or decreases in
17 WACOG and the associated path costs, and make it more difficult for marketers to
18 forecast costs and manage the risks of multiple year contracts with their customers. The
19 added risk of a multiple year contract will take these choices away or make them more
20 expensive for customers, and may result in driving customers out of the competitive
21 market altogether as they will limit the value a marketer can offer a customer. In
22 contrast, a three-year moving average intentionally has been used to smooth out the
23 variation year to year and is a standard technique employed in ratemaking. Over time, a

1 moving average of actual data is going to better approximate actual costs than a forecast.
2 By definition, a forecast is a “snapshot” estimate made at a point in time, and may not
3 resemble actual costs at all. Use of a three-year moving average makes it easier to
4 predict costs used in multiple year contracts. A one-year forecast methodology would
5 make it extremely difficult to accurately project costs and adds unreasonable risks to the
6 marketer and increased prices to cover those risks to the customer.

7 **Q. What do you recommend to the Commission regarding the WACOG methodology?**

8 A. Direct recommends that the Commission direct NGRID to continue to use the three year
9 moving average method that has been in place for the last 8-10 years to calculate the
10 2009-10 WACOG. This method allowed for gradual change in costs over which
11 marketers have no control. Utilities can lock in costs on their own paths for up to 24
12 months. It is difficult for marketers to do the same as their path costs from the utility
13 change from year to year. Marketers have relied upon a fairly stable set of path costs
14 from year to year based upon the three-year moving average in serving their multiple year
15 contracts with their customers. Significant changes in path costs from year-to-year can
16 change the underlying economics of those contracts. Marketers use their best estimate of
17 the costs underlying a contract to price it for the customer. The marketer can reasonably
18 estimate demand costs, and can hedge commodity costs to reduce risk. The addition of a
19 volatile basis calculation component, already a difficult component to estimate and
20 manage its risks, will be much more difficult to estimate across multiple years if its
21 calculation methodology moves to a forecast. NGRID should not be allowed to change
22 the underlying methodology without fully examining with marketers how such a change
23 will affect the competitive marketplace.

1 **Q. What is the second area of concern?**

2 A. The second area of concern involves the composition of the costs used to determine the
3 basis portion of the WACOG. It is not clear to Direct that hedging costs are not included
4 in the \$0.3614 per Dth Average System Variable Unit Value in Revised
5 Attachment EDA-4, page 10 of 18. The beginning number of \$193,623,687 identified as
6 Step 1 in NGRID's response to Direct's Data Request 1-2 is similar to the \$196,408,852
7 total figure in the second to last line in the original Attachment EDA-2, page 9 of 17, to
8 Elizabeth Arangio's testimony, and titled "Total GCR Cost including Financial Hedges,
9 Excluding Injections." Direct has requested from NGRID a list of costs included in the
10 beginning cost identified in NGRID's response to Direct's Data Request 1-2. Once
11 Direct receives that information, Direct will have a better basis for making a
12 recommendation.

13 **Q. What if the WACOG includes hedging costs?**

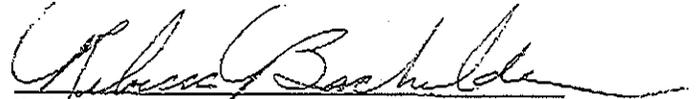
14 A. If the WACOG includes hedging costs, these costs should be removed. Hedging costs
15 are supply related and do not belong in a transportation rate. Marketers incur their own
16 costs if they choose to hedge commodity prices. If hedging costs are included in the
17 basis calculation, transportation customers would be paying for hedging twice – once
18 from NGRID and again from their marketer. Hedging costs are appropriately allocated to
19 supply service.

1 Q: Does this complete your testimony?

2 A: Yes it does.

3 Signed under the pains and penalties of perjury this 16th day of October, 2009.

4
5
6
7
8



Rebecca Bachelder

Attachment RSB-1

**Rebecca S. Bachelder
List of Regulatory Witness Appearances**

Witness Appearances

MA D.P.U. 08-GC-1	For Hess Corp.	Petition of NSTAR Gas Company, pursuant to G.L. c. 164, § 94, for approval by the Department of Public Utilities of a gas balancing agreement with Mirant Kendall, LLC.
CT Docket No. 08-09-03 –	For Hess Corp.	Application of Hess Corporation for Consideration to Waive Imbalanced Penalties
CT Docket 08-03-17:	For Hess Corp.	DPUC Investigation into the Billing Practices of Gas and Water Companies
CT Docket No. 06-04-04	For Hess Corp. and Constellation New Energy Gas Division	Continued Unbundling of Natural Gas Services – Contested Docket – Representing Clients in litigated proceeding and negotiations
MA Docket DTE 06-36	For Hess Corp.	Bay State Gas Company – Rates – Request to implement new planning standard and implement a reserve charge for grandfathered transportation customers.
CT Docket No 05-03-17	For Amerada Hess and Select Energy	Southern Connecticut Gas – Request for Rate Increase – Representing clients in litigated proceeding and negotiations
CT Docket No 04-05-11	For Amerada Hess and Select Energy	Generic Review of Southern Methodology of Allocating Gas Costs – Representing Clients in litigated proceeding
CT Docket 05-05-10	For Amerada Hess and Select Energy	Unbundling of Natural Gas Services – Contested Docket – Representing Clients in litigated proceeding and negotiations
CT Docket No. 97-07-11RE02	On behalf of Amerada Hess Corp. and Select Energy, Inc., Rulemaking	Investigation into Issues Associated with the Unbundling of Natural Gas Services including Capacity Assignment, Cost Responsibility and Supplier of Last Resort.
CT Docket No. 97-07-11PH02	On behalf of AllEnergy, Rulemaking	Generic Investigation into Issues Associated with the Unbundling of Natural Gas Services including Capacity Assignment, Cost Responsibility and Supplier of Last Resort.
CT Docket No. 01-05-19PH02	On Behalf of AllEnergy, Adjudicatory	Yankee Gas Company – Rate Design
MA DTE 01-81	On behalf of AllEnergy, Adjudicatory	Bay State Gas Company proposal to implement a Gas Cost Incentive Mechanism.
CT Dockets No. 95-02-07, 92-02-19, 93-03-09	On behalf of AllEnergy, Adjudicatory	Reopen rate cases of CNG, SCG and YGS for purposes of examining terms and conditions of unbundled programs for commercial and industrial customers.
MA DTE 98-32-D	On Behalf of AllEnergy, Compliance	Generic Application of Model Terms and Conditions to All MA LDCs
MA DTE 98-32	On behalf of AllEnergy, Rulemaking	Generic Investigation into Issues of Gas Unbundling in Massachusetts, specifically issues dealing with Capacity Assignment Programs and Allocation of Transition Costs.
CT Docket No 97-07-11	On behalf of AllEnergy, Rulemaking	Generic Investigation into Issues Associated With The Unbundling of Natural Gas Services by Connecticut Local Distribution Companies
MA DPU 97-65	On behalf of AllEnergy, Rulemaking	Model Terms and Conditions for Distribution Companies (Electric)
MA DPU 96-100	On Behalf of AllEnergy, Rulemaking	Generic Investigation into Electric Restructuring
MA DPU 96-66	On behalf of Boston Gas Company Global Petroleum Complaint re: transfer of contracts to AllEnergy	Appropriateness of contract transfer
MA DPU 96-50	On behalf of Boston Gas Company General Rate Increase, Performance Based Regulation Plan, Unbundling, Exit the Merchant Business	Performance-Based Regulation, Competitive Pricing
MA DPU 93-141	On behalf of Boston Gas Company Rule Making	Interruptible and Capacity Release Investigation
MA DPU 93-60	On behalf of Boston Gas Company General Rate Increase	Cost Allocation, Weather and Other Revenue Normalizing Adjustments, Marginal Cost, Rate Design including Transportation Rates and Cost of Gas Adjustment Clause
MA DPU 92-230	On behalf of Boston Gas Company Rule-Making	Review of appropriate ratemaking treatment of Vehicular Natural Gas services.

Attachment RSB-1

MA DPU 92-259	On behalf of Boston Gas Company Tariff Filing	Economic Incentive Rate
MA DPU 90-320	On behalf of Boston Gas Company Conservation and Load Management	Cost Recovery of Gas Evaluation and Monitoring System
MA DPU 90-55	On behalf of Boston Gas Company General Rate Increase	Cost Allocation, Marginal Cost and Cost of Gas Adjustment Clause
MA DPU 88-67 Phase II	On behalf of Boston Gas Company Rate Design	Cost allocation and Marginal Cost
MA DPU 88-67	On behalf of Boston Gas Company General Rate Increase	Cost Allocation, Weather Normalization and Cost of Gas Adjustment Clause
MA DPU 84-236	On behalf of Boston Gas Company Contract Filing	West Lynn Creamery, Cost Allocation
MA DPU 1669	On behalf of Boston Gas Company Rule-Making	Cost of Gas Adjustment Clause

Attachment RSB-1

Rebecca S. Bachelder

List of Regulatory Proceeding Participation

IV. Connecticut

CT Docket No. 06-04-04	For Hess Corp. and Constellation New Energy Gas Division	Continued Unbundling of Natural Gas Services – Contested Docket – Representing Clients in litigated proceeding and negotiations
CT Docket No 05-03-17	For Amerada Hess and Select Energy	Southern Connecticut Gas – Request for Rate Increase – Representing clients in litigated proceeding and negotiations
CT Docket No 04-05-11	For Amerada Hess and Select Energy	Generic Review of Southern Methodology of Allocating Gas Costs – Representing Clients in litigated proceeding
CT Docket 05-05-10	For Amerada Hess and Select Energy	Unbundling of Natural Gas Services – Contested Docket – Representing Clients in litigated proceeding and negotiations
CT Docket 97-07-11RE02	For Amerada Hess and Select Energy	Unbundling of Natural Gas Services – Submitted testimony, working on negotiating a settlement for year 4 and beyond.
CT Docket 97-07-11RE01	For Amerada Hess and Select Energy	Unbundling of Natural Gas Services – Negotiated Year 3 Settlement
CT Docket No. 02-10-01	For AllEnergy – Submitted Testimony	Semi-Annual Investigation of Purchased Gas Adjustment Clause
CT Docket No. 01-05-19PH02	For AllEnergy – Submitted Testimony, Discovery, Cross Examination and Briefs	Yankee Gas Company, Rate Design
CT Docket No. 97-07-11PH02	For AllEnergy – Testimony, Cross Examination and Settlement	Unbundling of Natural Gas Services – SOLR, Capacity Assignment, Cost responsibility
CT Docket No. 99-04-18PH04	For AllEnergy - Cross-examination and Briefing	Southern Connecticut Gas Rate Redesign, including balancing, cashout, metering provisions.
CT Docket No. 00-07-18	For AllEnergy – Joint Comments	DPUC Report on Ways to Encourage Competition Among Gas Suppliers
CT Docket No. 99-03-28	For AllEnergy – Comments, Cross Examination and Briefing	DPUC Review of LDC Cost of Service Methodologies
CT Docket No. 95-02-07	Comments, Cross Examination, Briefing, Written Exceptions and Motion for Reconsideration	CNG Reopened Rate Case to Implement Unbundling Rules
CT Docket No. 93-03-09	Comments, Cross Examination, Briefing, Written Exceptions and Motion for Reconsideration	Southern Reopened Rate Case to Implement Unbundling Rules
CT Docket No. 92-02-19	Comments, Cross Examination, Briefing, Written Exceptions and Motion for Reconsideration	Yankee Reopened Rate Case to Implement Unbundling Rules
CT Docket No. 97-07-11	Comments, Cross Examination, Collaborative participation, Briefing, Written Exceptions	Unbundling of Natural Gas Services
CT Docket No. 98-02-04	Complaint, Discovery and Negotiated Settlement	Yankee Gas - Joint Complaint for Relief of Marketers

V. Massachusetts

MA Docket DTE 06-36	For Hess Corp.	Bay State Gas Company – Rates – Request to implement new planning standard and implement a reserve charge for grandfathered transportation customers.
MA DTE 04-01	For Amerada Hess and Select Energy	Submitted Comments, responded to discovery
MA DTE 01-107	For AllEnergy – Testimony, Discovery, Assist in Cross Examination and Briefing	Bay State Gas Request for Approval of Tariff Changes - Gas
MA DTE 01-100	For AllEnergy – Comments	Investigation into LDC's use of Risk Management Tools - Gas
MA DTE 01-98	For AllEnergy – Comments	Investigation of Billing Services – Electric
MA DTE 01-81	For AllEnergy – Testimony, Discovery, Assist in Cross Examination and Briefing	Bay State Gas Request for Approval to Implement A Gas Cost Incentive Mechanism
MA DTE 01-54	For AllEnergy – Comments	Investigation into Competitive Market Initiatives - Electric
MA DTE 01-49	For AllEnergy – Comments	Investigation of Cost of Gas Adjustment Clause – Gas
MA D.T.E. 01-28 (Phase II)	For AllEnergy – Oral and Written Comments	Billing Services to be Provided by Electric Distribution Companies to Competitive Suppliers Serving Customers in Their Service Territories
MA DTE 99-84-B	For AllEnergy – Comments	Establishment of Service Quality Standards for LDCs. Gas & Electric

Attachment RSB-1

MA DTE 99-76	For AllEnergy – Comments	Boston Gas, Colonial Essex Approval of Portfolio Management Contract. - Gas
MA DTE 99-60	For AllEnergy – Comments	Pricing and Procurement of Default Service - Electric
MA DTE 98-32-D	For AllEnergy – Comments and Testimony	Capacity Assignment Methodology – Compliance -Gas
MA DTE 98-32-C	For AllEnergy – Settlement	Capacity Assignment Methodology – Gas
MA DTE 98-32-B	For AllEnergy – Comments	Capacity assignment - Gas
MA DTE 98-32-A	For AllEnergy – Settlement	Model Terms and Conditions – Gas
MA DPU 97-65	For AllEnergy – Comments and Oral Testimony	Model Terms and Conditions for Distribution Companies
MA DPU 97-49	Discovery, Cross-Examination Preparation and Briefing	Tewksbury LNG and DOMAC, LNG Storage and Vaporization Agreement
AG Regulations	Comments	AG Proposed modifications to 940 CMR 19.00
MA DPU 96-50	For Boston Gas - Motion For Reconsideration	Performance Based Regulation. – Gas
MA DPU 94-158	For Boston Gas - Assist in Comments	Incentive Regulation for Electric and Gas Companies.
MA DPU 94-104	For Boston Gas - Assist in Testimony Preparation	Recovery of FERC Order 636 Transition Charges. Gas

Attachment RSB-1

VI. Maine

ME Docket No. 2006-390	For Hess Corporation -	Northern Utilities -- Integrated Resource Plan -- Proposed Planning Standards
ME Docket No. 2006-141	For Hess Corporation -- Temporary Implementation of Docket No. 2005-87 Settlement.	Northern Utilities -- Interim Reserve Charge
ME Docket No. 2005-87	For Select Energy -- Negotiated Modification to mandatory assignment proposal	Northern Utilities -- Proposed modification to Transportation Tariffs.
ME Docket No. 97-393	For AllEnergy -- Comments	Northern Utilities Rate Stipulation. Gas
ME Docket No. 99-342	For AllEnergy -- Comments	Inquiry into Natural Gas Competition and Unbundling.

VII. New Hampshire

DG 105	For Hess Corporation -	Keyspan -- Integrated Resource Plan
DG 06-98	For Hess Corporation -	Northern Utilities -- Integrated Resource Plan -- Proposed Planning Standards
DG 06-33	For Hess Corporation -- Temporary Implementation of Maine Docket No. 2005-87 Settlement.	Northern Utilities -- Interim Reserve Charge
NH DE 98-124	For AllEnergy -- Collaborative	Restructuring -- Gas

VIII. New Jersey

NJ Docket No. GX99030121	For AllEnergy -- Intervenor	In the Matter of the Rate Unbundling Filings by Gas Public Utilities
NJ Docket No. G099030122	For AllEnergy -- Intervenor	Rate Unbundling Filing by Elizabethtown Gas
NJ Docket No. G099030123	For AllEnergy -- Intervenor	Rate Unbundling Filing by New Jersey Natural Gas
NJ Docket No. G099030124	For AllEnergy -- Intervenor	Rate Unbundling Filing by Public Service Electric & Gas
NJ Docket No. G099030125	For AllEnergy -- Intervenor	Rate Unbundling Filing by South Jersey Gas

IX. New York

NY Case No. 99-M-0631 Case 03-M-0117	For AllEnergy -- Comments	A. In the Matters of Customer Billing Arrangements and in the Matter of the Implementation of Chapter 686 of the Laws of 2002
NY Case No. 98-M-1343	For AllEnergy -- Comments	In the Matter of Uniform Business Rules
NY Case No. 01-G-1668 -- Phase 2	For AllEnergy -- Negotiations	NYSEG -- Marketer Tariff Provisions
NY Case No. 97-G-1380	For AllEnergy -- Comments and participant	Future of Gas Distribution Companies -- Reliability Collaborative
NY Case 02-G-0199	For AllEnergy -- Supervised Testimony	RG&E General Rate Case
NY Case 01-G-1668	For AllEnergy -- Supervised Settlement	NYSEG General Rate Case
NY Case 99-G-0336	For AllEnergy -- Participant	Niagara Mohawk Rates and Restructuring
NY Case 99-M-0631	For AllEnergy -- Comments	Customer Billing Arrangements
NY Case 98-G-0336	For AllEnergy -- Supervised Settlement	Rochester Gas & Electric Rates and Restructuring
NY Case 98-M-0667	For AllEnergy -- Assist in Comments	Electronic Data Interchange
NY Case 98-M-1343	For AllEnergy -- Comments	Uniform Business Rules for Retail Access

Attachment RSB-1

X. Pennsylvania

PA Docket No. M-00960890	Joint Comments	Standards for Electronic Data Transfer and Exchange Between Electric Distribution Companies and Suppliers
-----------------------------	----------------	--

XI. Rhode Island

RI Docket No 2552	For AllEnergy – Comments and negotiations	Providence Gas Company - Unbundling
RI	For AllEnergy – Comments	Natural Gas Regulations for LDCs Pertaining to Marketers

National Grid Pipeline Path Pricing - 2007-08 thru 200

	2005-2006 Surcharge /Credit	2006-2007 Surcharge /Credit	2007-2008 Surcharge /Credit	2008-2009 Surcharge /Credit	2009-2010 Proposed Surcharge /Credit	2005 - 2006 vs 2006 - 2007 Difference	2006 - 2007 vs 2007 - 2008 Difference	2007 - 2008 vs 2008 - 2009 Difference	2008 - 2009 vs. 2009 - 2010 Difference
MAGOG	\$ 1.439	\$ 1.257	\$ 0.679	\$ 0.944	\$ 0.963	\$ (0.182)	\$ (0.378)	\$ 0.065	\$ 0.019
Tennessee Zone 1	\$ (0.026)	\$ (0.065)	\$ (0.323)	\$ (0.205)	\$ 0.022	\$ (0.039)	\$ (0.258)	\$ 0.118	\$ 0.227
Algonquin @ Lambertville	\$ 0.180	\$ (0.006)	\$ (0.212)	\$ (0.198)	\$ 0.248	\$ (0.186)	\$ (0.206)	\$ 0.014	\$ 0.446
Texas Eastern - South Texas Algonquin @ Lambertville	n/a		\$ (0.258)	\$ (0.044)	\$ -0.221			\$ 0.214	\$ (0.177)
Texas Eastern - West La Algonquin @ Lambertville	\$ (0.571)	\$ (0.499)	\$ (0.568)	\$ (0.363)	\$ -0.181	\$ 0.072	\$ (0.069)	\$ 0.205	\$ 0.182
Texas Eastern - East La Algonquin @ Lambertville	\$ (0.443)	\$ (0.406)	\$ (0.504)	\$ (0.313)	\$ -0.177	\$ 0.037	\$ (0.098)	\$ 0.191	\$ 0.136
Columbua (Maunsee/Downtington)	n/a		\$ (0.014)	\$ 0.035	\$ 0.326			\$ 0.049	\$ 0.291

High	\$ 0.072	\$ (0.069)	\$ 0.214	\$ 0.446
Low	\$ (0.186)	\$ (0.258)	\$ 0.014	\$ (0.177)
Range of Change in Prices	\$ 0.258	\$ 0.189	\$ 0.200	\$ 0.623

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

National Grid - Annual Gas Cost
Recovery Charge Filing

Docket No. 4097

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served electronically the foregoing document upon each person designated on the service list compiled in this proceeding.

Dated in Boston, MA this 16th day of October, 2009.



Robert G. Clifford

SERVICE LIST

Name/Address	E-mail	Telephone/ Facsimile
File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Boulevard Warwick RI 02888	Lmassaro@puc.state.ri.us	(401) 780-2107
	Plucarelli@puc.state.ri.us	(401) 941-1691
	Sccamara@puc.state.ri.us	
Thomas R. Teehan, Esquire National Grid 280 Melrose Street Providence, RI 02907	Thomas.teehan@us.ngrid.com	(401) 784-7667
	Peter.Czekanski@us.ngrid.com	(401) 784-4321
	Joanne.scanlon@us.ngrid.com	
Leo Wold, Esquire Department of Attorney General 150 South Main Street Providence, RI 02903	Lwold@riag.ri.gov	(401) 222-2424
	Sscialabba@ripuc.state.ri.us	(401) 222-3016
	Mtobin@riag.ri.gov	
	dmacrae@riag.ri.gov	

Name/Address	E-mail	Telephone/ Facsimile
David C. Fixler, Esquire Rubin and Rudman LLP 50 Rowes Wharf, 3 rd Floor Boston, MA 02110	<u>dfixler@rubinrudman.com</u>	(617) 330-7000
Bruce Oliver Revilo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	<u>Boliver.rha@verizon.net</u>	(703) 569-6480