

September 27, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4283 - 2011 Gas Charge Recovery Filing
Supplemental Testimony of John F. Nestor, III**

Dear Ms Massaro:

Enclosed please find ten (10) copies of the Supplemental Direct Testimony of John F. Nestor, III, which is being submitted to amend the Company's¹ requested GCR rates for effect November 1, 2011.

The Gas Cost Recovery ("GCR") rates that the Company had proposed for effect November 1, 2011 incorporated a methodology and rate design that were dependent on new billing systems for support. Because the transition to those new billing systems will not occur on November 1 as anticipated, the Company is now requesting that the Commission approve the GCR rates provided in Attachment NG-JFN-1 (5), page 1, of its September 13 filing. Those rates reflect a calculation of gas costs under the existing methodology and rate design.

As described in Mr. Nestor's Supplemental Testimony, under the amended proposed GCR rates an average residential heating customer using 922 therms per year will experience an annual decrease of approximately \$107.11 or an annual 7.8% percent decrease as compared to the currently effective GCR rates. In addition, for the average residential heating customer the combined impact of the amended proposed GCR rates and the Distribution Adjustment Charge ("DAC") rates that have been proposed in Docket 4269 is an annual reduction of approximately \$107 or 8.0% as compared to the currently effective GCR and DAC rates.

Thank you for your attention to this filing. If you have any questions, please do not hesitate to contact me at (401) 784-7667.

Sincerely,



Thomas R. Teehan

Enclosures

cc: Leo Wold, Esq.
Steve Scialabba
Bruce Oliver

¹ The Narragansett Electric Company d/b/a National Grid ("Company").

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.



Joanne M. Scanlon

September 27, 2011

Date

Docket No. 4097 – National Grid – 2011 Annual Gas Cost Recovery Filing (“GCR”) - Service List as of 9/13/11

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

NATIONAL GRID

DOCKET No. 4283

SUPPLEMENTAL DIRECT TESTIMONY

OF

JOHN F. NESTOR, III

September 27, 2011

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is John F. Nestor, III. My business address is Reservoir Woods, 40 Sylvan
3 Road, Waltham, Massachusetts 02451-1120.

4 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?**

5 A. Yes. I previously filed direct testimony in this case on September 13, 2011.

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

7 A. The purpose of this testimony is to amend my September 13, 2011 testimony and to
8 now request that the Commission approve the gas cost recovery (“GCR”) rates filed in
9 Attachment NG-JFN-1 (5) for effect November 1, 2011.

10 **Q. WHY IS THE COMPANY NOW REQUESTING THE APPROVAL OF THE**
11 **GAS COST RATES FILED IN ATTACHMENT NG-JFN-1 (5) FOR EFFECT**
12 **NOVEMBER 1, 2011?**

13 A. As noted in my direct testimony of September 13, 2011, the Company had proposed to
14 restructure its GCR rates into a two-component rate design (“Fixed” and “Variable”)
15 and introduce a new FT-2 rate for Marketers that was agreed to as part of a
16 collaborative process between the Company and the Marketers. The Company had
17 requested that these proposed rates and rate design be implemented on November 1,
18 2011 with the anticipated change over to new customer and Marketer billing systems
19 that would be able to support the proposed Marketer tariff changes. (Nestor Direct at
20 5) However, at this time, the implementation of these new customer and Marketer

1 billing systems has been extended, and as such those billing systems will not be
2 available on November 1, 2011 to support the GCR rates that had been requested in
3 Attachment NG-JFN-1. (Nestor Direct at 10)

4 In Attachment NG-JFN-1 (5), Page 1 found in the GCR filing, the Company also
5 provided a calculation of gas costs under the existing five cost component format,
6 which was developed utilizing the same methodology used in Docket No. 4199 (last
7 year's GCR filing) and the existing rate design. In light of the delay in implementing
8 the new billing systems, the Company is now requesting that the Commission approve
9 the GCR rates provided in Attachment NG-JFN-1 (5), page 1, a copy of which is
10 attached to this supplemental testimony for ease of reference.

11 **Q. WHAT IS THE BILL IMPACT OF THE GCR RATES ESTABLISHED IN**
12 **ATTACHMENT NG-JFN-1 (5)?**

13 A. Under the GCR rates established in Attachment NG-JFN-1 (5), an average residential
14 heating customer using 922 therms per year will experience a decrease of
15 approximately \$107.11 or an annual 7.8% percent decrease over the currently effective
16 rates. A summary of annual bill impacts for customers with various levels of usage is
17 provided on Attachment NG-JFN-4 (5), a copy of which is attached for ease of
18 reference. In addition to the proposed GCR factors, any bill impact analysis should
19 recognize the proposed decrease in DAC factors filed in Docket No. 4269. Thus,
20 overall, the average residential heating customer will experience an annual decrease of
21 \$110 or 8.1% from the new proposed DAC and GCR rates.

1 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

2 A. Yes.

Gas Cost Recovery (GCR)
Factors Effective November 1, 2011

(\$ per Dth)

Line No.	Description (a)	Reference (b)	Residential Non-Heat (c)	Residential Heat (d)	Small C&I (e)	Medium C&I (f)	Large LLF (g)	Large HLF (h)	Extra Large LLF (i)	Extra Large HLF (j)	FT-2 Mkter (k)	NGV (l)
1	Supply Fixed Cost Factor	pg. 2	\$0.6566	\$0.9727	\$0.9727	\$0.9727	\$0.9727	\$0.6566	\$0.9727	\$0.6566	n/a	\$0.6566
2	Storage Fixed Cost Factor	pg. 3	\$0.2206	\$0.3362	\$0.3362	\$0.3362	\$0.2206	\$0.3362	\$0.2206	\$0.2206	\$0.3290	
3	Supply Variable Cost Factor	pg. 4	\$5.3842	\$5.3842	\$5.3842	\$5.3842	\$5.3842	\$5.3842	\$5.3842	\$5.3842	n/a	\$5.3842
4a	Storage Variable Product Cost Factor	pg. 5	\$1.0102	\$1.0102	\$1.0102	\$1.0102	\$1.0102	\$1.0102	\$1.0102	\$1.0102	n/a	
4b	Storage Variable Non-product Cost Factor	pg. 5	\$0.0309	\$0.0309	\$0.0309	\$0.0309	\$0.0309	\$0.0309	\$0.0309	\$0.0309	\$0.0309	
5	Total Gas Cost Recovery Charge	(1)+(2)+(3)+(4)	\$7.3025	\$7.7342	\$7.7342	\$7.7342	\$7.7342	\$7.3025	\$7.7342	\$7.3025	\$0.3599	\$6.0408
6	Uncollectible %	Docket 3943	2.46%	2.46%	2.46%	2.46%	2.46%	2.46%	2.46%	2.46%	2.46%	2.46%
7	Total GCR Charge adjusted for Uncollectibles	(5) / [(1 - (6))]	\$7.4867	\$7.9293	\$7.9293	\$7.9293	\$7.9293	\$7.4867	\$7.9293	\$7.4867	\$0.3690	\$6.1932
8	GCR Charge on a per therm basis	(7) / 10	\$0.7487	\$0.7929	\$0.7929	\$0.7929	\$0.7929	\$0.7487	\$0.7929	\$0.7487	\$0.0369	\$0.6193
	Current rate effective 11/01/11 difference		\$0.8803 (\$0.1316) -14.9%	\$0.9091 (\$0.1162) -12.8%	\$0.9091 (\$0.1162) -12.8%	\$0.9091 (\$0.1162) -12.8%	\$0.9091 (\$0.1162) -12.8%	\$0.8803 (\$0.1316) -14.9%	\$0.9091 (\$0.1162) -12.8%	\$0.8803 (\$0.1316) -14.9%	\$0.0367 \$0.0002 0.5%	\$0.7436 (\$0.1243) -16.7%

**Bill Impact Analysis with Various Levels of Consumption:
Current Distribution, GCR, DAC, and ISR Rates thru October 2012**

Residential Heating:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
600	\$886	\$956	(\$70)	-7.3%	\$0	(\$69.71)	\$0.00	\$0.00	\$0.00	
664	\$965	\$1,042	(\$77)	-7.4%	\$0	(\$77.16)	\$0.00	\$0.00	\$0.00	
730	\$1,046	\$1,131	(\$85)	-7.5%	\$0	(\$84.84)	\$0.00	\$0.00	\$0.00	
794	\$1,123	\$1,215	(\$92)	-7.6%	\$0	(\$92.24)	\$0.00	\$0.00	\$0.00	
857	\$1,196	\$1,296	(\$100)	-7.7%	\$0	(\$99.56)	\$0.00	\$0.00	\$0.00	
Average Customer	922	\$1,272	\$1,379	(\$107)	-7.8%	\$0	(\$107.11)	\$0.00	\$0.00	\$0.00
987	\$1,347	\$1,461	(\$115)	-7.8%	\$0	(\$114.68)	\$0.00	\$0.00	\$0.00	
1,051	\$1,420	\$1,542	(\$122)	-7.9%	\$0	(\$122.15)	\$0.00	\$0.00	\$0.00	
1,114	\$1,491	\$1,620	(\$129)	-8.0%	\$0	(\$129.42)	\$0.00	\$0.00	\$0.00	
1,180	\$1,564	\$1,701	(\$137)	-8.1%	\$0	(\$137.10)	\$0.00	\$0.00	\$0.00	
1,247	\$1,639	\$1,784	(\$145)	-8.1%	\$0	(\$144.91)	\$0.00	\$0.00	\$0.00	

Residential Heating Low Income:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
600	\$848	\$918	(\$70)	-7.6%	\$0	(\$69.71)	\$0.00	\$0.00	\$0.00	
664	\$925	\$1,002	(\$77)	-7.7%	\$0	(\$77.16)	\$0.00	\$0.00	\$0.00	
730	\$1,003	\$1,088	(\$85)	-7.8%	\$0	(\$84.84)	\$0.00	\$0.00	\$0.00	
794	\$1,078	\$1,170	(\$92)	-7.9%	\$0	(\$92.24)	\$0.00	\$0.00	\$0.00	
857	\$1,150	\$1,249	(\$100)	-8.0%	\$0	(\$99.56)	\$0.00	\$0.00	\$0.00	
Average Customer	922	\$1,223	\$1,330	(\$107)	-8.1%	\$0	(\$107.11)	\$0.00	\$0.00	\$0.00
987	\$1,296	\$1,411	(\$115)	-8.1%	\$0	(\$114.68)	\$0.00	\$0.00	\$0.00	
1,051	\$1,368	\$1,490	(\$122)	-8.2%	\$0	(\$122.15)	\$0.00	\$0.00	\$0.00	
1,114	\$1,436	\$1,566	(\$129)	-8.3%	\$0	(\$129.42)	\$0.00	\$0.00	\$0.00	
1,180	\$1,508	\$1,645	(\$137)	-8.3%	\$0	(\$137.10)	\$0.00	\$0.00	\$0.00	
1,247	\$1,581	\$1,726	(\$145)	-8.4%	\$0	(\$144.91)	\$0.00	\$0.00	\$0.00	

**Bill Impact Analysis with Various Levels of Consumption:
Current Distribution, GCR, DAC, and ISR Rates thru October 2012**

Residential Non-Heating:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
123	\$270	\$286	(\$16)	-5.7%	\$0	(\$16.16)	\$0.00	\$0.00	\$0.00	
137	\$287	\$305	(\$18)	-5.9%	\$0	(\$17.99)	\$0.00	\$0.00	\$0.00	
147	\$299	\$318	(\$19)	-6.1%	\$0	(\$19.31)	\$0.00	\$0.00	\$0.00	
161	\$316	\$337	(\$21)	-6.3%	\$0	(\$21.14)	\$0.00	\$0.00	\$0.00	
176	\$334	\$357	(\$23)	-6.5%	\$0	(\$23.14)	\$0.00	\$0.00	\$0.00	
Average Customer	189	\$350	\$375	(\$25)	-6.6%	\$0	(\$24.88)	\$0.00	\$0.00	\$0.00
202	\$366	\$392	(\$27)	-6.8%	\$0	(\$26.59)	\$0.00	\$0.00	\$0.00	
217	\$384	\$412	(\$29)	-6.9%	\$0	(\$28.56)	\$0.00	\$0.00	\$0.00	
231	\$401	\$431	(\$30)	-7.1%	\$0	(\$30.41)	\$0.00	\$0.00	\$0.00	
241	\$413	\$445	(\$32)	-7.1%	\$0	(\$31.72)	\$0.00	\$0.00	\$0.00	
256	\$431	\$465	(\$34)	-7.2%	\$0	(\$33.69)	\$0.00	\$0.00	\$0.00	

Residential Non-Heating Low Income:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
123	\$253	\$269	(\$16)	-6.0%	\$0	(\$16.16)	\$0.00	\$0.00	\$0.00	
137	\$269	\$287	(\$18)	-6.3%	\$0	(\$17.99)	\$0.00	\$0.00	\$0.00	
147	\$281	\$300	(\$19)	-6.4%	\$0	(\$19.31)	\$0.00	\$0.00	\$0.00	
161	\$297	\$319	(\$21)	-6.6%	\$0	(\$21.14)	\$0.00	\$0.00	\$0.00	
176	\$315	\$338	(\$23)	-6.8%	\$0	(\$23.14)	\$0.00	\$0.00	\$0.00	
Average Customer	189	\$330	\$355	(\$25)	-7.0%	\$0	(\$24.88)	\$0.00	\$0.00	\$0.00
202	\$346	\$372	(\$27)	-7.1%	\$0	(\$26.59)	\$0.00	\$0.00	\$0.00	
217	\$363	\$392	(\$29)	-7.3%	\$0	(\$28.56)	\$0.00	\$0.00	\$0.00	
231	\$380	\$410	(\$30)	-7.4%	\$0	(\$30.41)	\$0.00	\$0.00	\$0.00	
241	\$391	\$423	(\$32)	-7.5%	\$0	(\$31.72)	\$0.00	\$0.00	\$0.00	
256	\$409	\$443	(\$34)	-7.6%	\$0	(\$33.69)	\$0.00	\$0.00	\$0.00	

**Bill Impact Analysis with Various Levels of Consumption:
Current Distribution, GCR, DAC, and ISR Rates thru October 2012**

C & I Small:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
824	\$1,304	\$1,400	(\$96)	-6.8%	\$0	(\$95.74)	\$0.00	\$0.00	\$0.00	
916	\$1,412	\$1,519	(\$106)	-7.0%	\$0	(\$106.43)	\$0.00	\$0.00	\$0.00	
1,003	\$1,513	\$1,630	(\$117)	-7.1%	\$0	(\$116.53)	\$0.00	\$0.00	\$0.00	
1,092	\$1,614	\$1,741	(\$127)	-7.3%	\$0	(\$126.89)	\$0.00	\$0.00	\$0.00	
1,179	\$1,708	\$1,845	(\$137)	-7.4%	\$0	(\$136.98)	\$0.00	\$0.00	\$0.00	
Average Customer	1,269	\$1,806	\$1,953	(\$147)	-7.5%	\$0	(\$147.42)	\$0.00	\$0.00	\$0.00
1,359	\$1,903	\$2,061	(\$158)	-7.7%	\$0	(\$157.90)	\$0.00	\$0.00	\$0.00	
1,447	\$1,997	\$2,166	(\$168)	-7.8%	\$0	(\$168.17)	\$0.00	\$0.00	\$0.00	
1,535	\$2,092	\$2,270	(\$178)	-7.9%	\$0	(\$178.37)	\$0.00	\$0.00	\$0.00	
1,622	\$2,185	\$2,373	(\$188)	-7.9%	\$0	(\$188.49)	\$0.00	\$0.00	\$0.00	
1,715	\$2,284	\$2,484	(\$199)	-8.0%	\$0	(\$199.29)	\$0.00	\$0.00	\$0.00	

C & I Medium:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff	
						GCR	DAC			
							Base DAC	ISR		
7,117	\$8,493	\$9,320	(\$827)	-8.9%	\$0	(\$827.02)	\$0.00	\$0.00	\$0.00	
7,884	\$9,330	\$10,246	(\$916)	-8.9%	\$0	(\$916.12)	\$0.00	\$0.00	\$0.00	
8,649	\$10,166	\$11,171	(\$1,005)	-9.0%	\$0	(\$1,005.01)	\$0.00	\$0.00	\$0.00	
9,416	\$11,003	\$12,097	(\$1,094)	-9.0%	\$0	(\$1,094.15)	\$0.00	\$0.00	\$0.00	
10,185	\$11,843	\$13,027	(\$1,183)	-9.1%	\$0	(\$1,183.48)	\$0.00	\$0.00	\$0.00	
Average Customer	10,950	\$12,679	\$13,951	(\$1,272)	-9.1%	\$0	(\$1,272.40)	\$0.00	\$0.00	\$0.00
11,715	\$13,514	\$14,875	(\$1,361)	-9.2%	\$0	(\$1,361.28)	\$0.00	\$0.00	\$0.00	
12,484	\$14,354	\$15,804	(\$1,451)	-9.2%	\$0	(\$1,450.62)	\$0.00	\$0.00	\$0.00	
13,251	\$15,191	\$16,731	(\$1,540)	-9.2%	\$0	(\$1,539.77)	\$0.00	\$0.00	\$0.00	
14,016	\$16,027	\$17,656	(\$1,629)	-9.2%	\$0	(\$1,628.65)	\$0.00	\$0.00	\$0.00	
14,783	\$16,865	\$18,582	(\$1,718)	-9.2%	\$0	(\$1,717.77)	\$0.00	\$0.00	\$0.00	

**Bill Impact Analysis with Various Levels of Consumption:
Current Distribution, GCR, DAC, and ISR Rates thru October 2012**

C & I LLF Large:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff
						GCR	DAC		
							Base DAC	ISR	
37,532	\$42,891	\$47,252	(\$4,361)	-9.2%	\$0	(\$4,361.22)	\$0.00	\$0.00	\$0.00
41,573	\$47,354	\$52,184	(\$4,831)	-9.3%	\$0	(\$4,830.79)	\$0.00	\$0.00	\$0.00
45,616	\$51,819	\$57,119	(\$5,301)	-9.3%	\$0	(\$5,300.61)	\$0.00	\$0.00	\$0.00
49,660	\$56,285	\$62,055	(\$5,771)	-9.3%	\$0	(\$5,770.50)	\$0.00	\$0.00	\$0.00
53,699	\$60,746	\$66,986	(\$6,240)	-9.3%	\$0	(\$6,239.82)	\$0.00	\$0.00	\$0.00
Average Customer 57,742	\$65,211	\$71,921	(\$6,710)	-9.3%	\$0	(\$6,709.65)	\$0.00	\$0.00	\$0.00
61,785	\$69,676	\$76,855	(\$7,179)	-9.3%	\$0	(\$7,179.41)	\$0.00	\$0.00	\$0.00
65,824	\$74,137	\$81,786	(\$7,649)	-9.4%	\$0	(\$7,648.75)	\$0.00	\$0.00	\$0.00
69,868	\$78,603	\$86,722	(\$8,119)	-9.4%	\$0	(\$8,118.67)	\$0.00	\$0.00	\$0.00
73,911	\$83,068	\$91,657	(\$8,588)	-9.4%	\$0	(\$8,588.48)	\$0.00	\$0.00	\$0.00
77,952	\$87,531	\$96,589	(\$9,058)	-9.4%	\$0	(\$9,058.01)	\$0.00	\$0.00	\$0.00

C & I HLF Large:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff
						GCR	DAC		
							Base DAC	ISR	
37,970	\$38,125	\$43,122	(\$4,997)	-11.6%	\$0	(\$4,996.85)	\$0.00	\$0.00	\$0.00
42,061	\$42,078	\$47,613	(\$5,535)	-11.6%	\$0	(\$5,535.23)	\$0.00	\$0.00	\$0.00
46,151	\$46,030	\$52,103	(\$6,073)	-11.7%	\$0	(\$6,073.48)	\$0.00	\$0.00	\$0.00
50,240	\$49,980	\$56,591	(\$6,612)	-11.7%	\$0	(\$6,611.57)	\$0.00	\$0.00	\$0.00
54,329	\$53,931	\$61,080	(\$7,150)	-11.7%	\$0	(\$7,149.69)	\$0.00	\$0.00	\$0.00
Average Customer 58,418	\$57,881	\$65,569	(\$7,688)	-11.7%	\$0	(\$7,687.80)	\$0.00	\$0.00	\$0.00
62,508	\$61,833	\$70,059	(\$8,226)	-11.7%	\$0	(\$8,226.08)	\$0.00	\$0.00	\$0.00
66,596	\$65,783	\$74,547	(\$8,764)	-11.8%	\$0	(\$8,764.02)	\$0.00	\$0.00	\$0.00
70,686	\$69,734	\$79,036	(\$9,302)	-11.8%	\$0	(\$9,302.27)	\$0.00	\$0.00	\$0.00
74,775	\$73,685	\$83,525	(\$9,840)	-11.8%	\$0	(\$9,840.37)	\$0.00	\$0.00	\$0.00
78,867	\$77,638	\$88,017	(\$10,379)	-11.8%	\$0	(\$10,378.90)	\$0.00	\$0.00	\$0.00

**Bill Impact Analysis with Various Levels of Consumption:
Current Distribution, GCR, DAC, and ISR Rates thru October 2012**

C & I LLF Extra-Large:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff
						GCR	DAC		
							Base DAC	ISR	
189,450	\$185,773	\$207,787	(\$22,014)	-10.6%	\$0	(\$22,014.09)	\$0.00	\$0.00	\$0.00
209,855	\$205,394	\$229,780	(\$24,385)	-10.6%	\$0	(\$24,385.17)	\$0.00	\$0.00	\$0.00
230,255	\$225,011	\$251,766	(\$26,756)	-10.6%	\$0	(\$26,755.63)	\$0.00	\$0.00	\$0.00
250,655	\$244,628	\$273,754	(\$29,126)	-10.6%	\$0	(\$29,126.11)	\$0.00	\$0.00	\$0.00
271,059	\$264,247	\$295,744	(\$31,497)	-10.7%	\$0	(\$31,497.05)	\$0.00	\$0.00	\$0.00
Average Customer 291,462	\$283,867	\$317,735	(\$33,868)	-10.7%	\$0	(\$33,867.89)	\$0.00	\$0.00	\$0.00
311,865	\$303,486	\$339,725	(\$36,239)	-10.7%	\$0	(\$36,238.70)	\$0.00	\$0.00	\$0.00
332,269	\$323,106	\$361,716	(\$38,610)	-10.7%	\$0	(\$38,609.65)	\$0.00	\$0.00	\$0.00
352,669	\$342,723	\$383,703	(\$40,980)	-10.7%	\$0	(\$40,980.14)	\$0.00	\$0.00	\$0.00
373,069	\$362,339	\$405,690	(\$43,351)	-10.7%	\$0	(\$43,350.63)	\$0.00	\$0.00	\$0.00
393,474	\$381,961	\$427,682	(\$45,722)	-10.7%	\$0	(\$45,721.66)	\$0.00	\$0.00	\$0.00

C & I HLF Extra-Large:

Nov - Oct Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	Difference due to:			EnergyEff
						GCR	DAC		
							Base DAC	ISR	
184,661	\$174,030	\$198,331	(\$24,301)	-12.3%	\$0	(\$24,301.38)	\$0.00	\$0.00	\$0.00
204,549	\$192,385	\$219,304	(\$26,919)	-12.3%	\$0	(\$26,918.65)	\$0.00	\$0.00	\$0.00
224,435	\$210,738	\$240,274	(\$29,536)	-12.3%	\$0	(\$29,535.64)	\$0.00	\$0.00	\$0.00
244,321	\$229,092	\$261,244	(\$32,153)	-12.3%	\$0	(\$32,152.62)	\$0.00	\$0.00	\$0.00
264,206	\$247,444	\$282,214	(\$34,770)	-12.3%	\$0	(\$34,769.51)	\$0.00	\$0.00	\$0.00
Average Customer 284,094	\$265,800	\$303,186	(\$37,387)	-12.3%	\$0	(\$37,386.78)	\$0.00	\$0.00	\$0.00
303,982	\$284,155	\$324,159	(\$40,004)	-12.3%	\$0	(\$40,004.06)	\$0.00	\$0.00	\$0.00
323,867	\$302,507	\$345,128	(\$42,621)	-12.3%	\$0	(\$42,620.91)	\$0.00	\$0.00	\$0.00
343,753	\$320,861	\$366,099	(\$45,238)	-12.4%	\$0	(\$45,237.88)	\$0.00	\$0.00	\$0.00
363,639	\$339,214	\$387,069	(\$47,855)	-12.4%	\$0	(\$47,854.91)	\$0.00	\$0.00	\$0.00
383,527	\$357,569	\$408,042	(\$50,472)	-12.4%	\$0	(\$50,472.16)	\$0.00	\$0.00	\$0.00