

March 19, 2014

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4436 - Revised Gas Cost Recovery Filing
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of the National Grid's¹ responses to the Public Utilities Commission's ("PUC") First Set of Data Requests concerning the above-referenced proceeding.

Thank you for your attention to this filing. If you have any questions, please contact me at (401) 784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4436 Service List
Leo Wold, Esq.
Steve Scialabba
Bruce Oliver

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

PUC 1-1

Request:

Please provide the most recent NYMEX strip for natural gas.

Response:

The most recent NYMEX strip for natural gas as of March 5, 2014 for the period April 2014 through October 2014 is as follows:

<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>
\$4.523	\$4.484	\$4.505	\$4.539	\$4.529	\$4.496	\$4.505

In addition, the NYMEX settlement prices for February 2014 and March 2014 used in response to PUC 1-2 and PUC 1-3 are as follows:

<u>February</u>	<u>March</u>
\$5.557	\$4.855

PUC 1-2

Request:

Based on the most recent NYMEX strip, what would the rate increase need to be in April to keep the deferred balance from growing above \$34.4 million as of October, 2014?

Response:

Based on updated information, the Company currently projects the deferred gas cost balance by the end of October 2014 to be \$43.4 million. In this update, the Company has replaced the estimated gas cost and revenue for February 2014 with actual costs and revenue and has also updated the estimated gas costs for the period March through October 2014 utilizing a NYMEX strip and basis differentials as of March 5, 2014.

In order to achieve a \$34.4 million deferred balance by the end of October 2014, the Company would need to recover an additional \$9.0 million above what its current GCR factors are recovering from its customers during the period April through October 2014. This would result in a GCR surcharge of \$0.129 per therm (\$9.0 million divided by April through October sales of 69.75 million therms), resulting in a total GCR factor of \$0.77 per therm for High Load Factor customers and \$0.79 per therm for Low Load Factor customers. A typical residential heating customer using 258 therms over the April through October period, would see a total increase of \$35.00 (or 8.3%) above the amount they would have been billed over this period based on the current GCR factor, or an average increase of \$5 per month.

PUC 1-3

Request:

Based on the most recent NYMEX strip, what would the rate increase need to be in November, 2014 to recover the deferred balance if the PUC ordered no immediate rate increase for effect April 1, 2014?

Response:

As discussed in response to PUC 1-2, the Company currently estimates the deferred balance at the end of October 2014 to be \$43.3 million. The major driver for this deferred balance is the increase in gas prices as compared to those reflected in the Company's September 3, 2013 GCR Filing. In other words, the actual gas prices at which the Company bought gas during November 2013 through February 2014 and revised projected prices used to calculate estimated gas costs for March 2014 through October 2014 are significantly higher than the forecasted prices used to calculate the estimate of gas costs underlying the currently effective GCR factor.

In responding to the specific request, the Company must assume no change in the estimated gas costs presented by the Company and approved by the PUC in the Company's September 3, 2013 GCR Filing. Under this assumption, the Company would replace the 2012/13 GCR deferred balance of \$11.9 million currently being recovered in this year's GCR factor and which is scheduled to end on October 31, 2014 with the above \$43.3 million estimate of the deferred balance. This would result in a net increase in the amount to be recovered through the 2014/15 GCR factor of \$31.4 million. Assuming this is the only change to the amount to be recovered through the 2014/15 GCR factor, the GCR factor under this scenario would be increased by \$0.1246 per therm¹, reflecting the recovery of \$31.4 million over 12 months.

However, the Company believes it is not likely that estimated gas costs for the 2014/15 GCR year will equal what it had estimated for the current GCR year except for a change in the amount of recovery for the prior year's deferred balance. The Company cannot predict with any level of certainty what it may experience in the market next year, but the Company can apply some simple assumptions based on what it has experienced this year to date to illustrate a potential likelihood on what could be seen for estimated gas costs for the 2014/15 GCR year. Assuming normal sendout and pricing for next year similar to that experienced this year, customers could experience an increase in the estimate of gas costs for the 2014/15 GCR year of approximately

¹ This value is calculated as \$31.4 million divided by annual normal sales of 260 million therms, and reflects the uncollectibles gross up of 3.18%.

PUC 1-3, page 2

\$37.4 million.² Therefore, delaying the recovery of the \$43.3 million estimated deferred balance until November 2014, which would be added on top of a potential increase in estimated gas costs for the new GCR year of \$37.4 million could result in a total possible increase in the amount to be recovered from customers beginning November 1, 2014 of \$68.8 million (the \$31.4 million increase in the prior year deferral amount plus the \$37.4 million increase in gas costs for the 2014/15 GCR year). Under the conditions described above, the increase in GCR factor would be \$0.2732 per therm³ beginning in November 2014. Under these assumptions, this increase would result in significant bill increases to all customers billed through the GCR mechanism, whereby a typical residential heating customer using 846 therms per year could see a \$231, or 20%,⁴ bill increase from one GCR year to the next GCR year.

The Company believes that it needs to begin to collect a portion of the deferred balance beginning in April 2014 for two reasons: (1) to recover current costs from current customers while being mindful of bill impacts to all customer rate classes, and (2) to mitigate the total increase customers might experience as a result of an increase in estimated gas costs as a result of future market pricing.

- (1) The GCR mechanism is designed to recover current costs from current customers during a GCR year (November through October) and allows for interim adjustments to the GCR factor to minimize the recovery of current costs from future customers. In this filing, the Company is attempting to match the recovery of current costs within the GCR year while at the same time balancing customer bill impacts. The Company believes that its proposal to recover approximately \$17.5 million of the estimated under recovery during the April 2014 through October 2014 period and delaying recovery of the remaining \$25.8 million, based upon the updated estimate reflected in the February 2014 deferred report and reflected in the response to this information request, to the next GCR year would
- (2)

² Calculated as the difference between the current cost per dktherm associated with the variable component of gas costs for the 2013/14 GCR year as reflected in the Company's February 2014 deferred gas cost report, page 1, line 21 of \$170.2 million vs. the estimated cost per dktherm associated with the variable component of gas costs for the 2013/14 GCR year contained in Attachment AEL-3, page 3, line 1 of \$115.8 million, multiplied by the weather normal annual sales for the GCR year. The specific calculation is [(\$170.2 million ÷ 28.7 million dktherm) - (\$115.8 million ÷ 25.8 million dktherm)] x 25.8 million dktherm, or [\$5.93 - \$4.48] x 25.8 million, or \$37.4 million.

³ This value is calculated as \$68.8 million divided by annual normal sales of 260 million therms, and reflects the uncollectibles gross up of 3.18%.

⁴ The estimated dollar and percentage increases are based on the 2013-2014 annual residential heating bill of \$1,169 for customer using 846 therms.

PUC 1-3, page 3

contribute towards stabilizing the overall increase to customers over the nineteen month period of April 2014 through October 2015.

- (3) The Company believes caution is warranted in evaluating whether to delay recovery of the full amount of the estimated deferred balance to November 2014. Beginning a meaningful recovery on April 1, 2014 will mitigate the potential impact of the GCR factor for November 1, 2014 reflecting increased recovery as a result of potentially higher estimated gas costs. Under the Company's proposal to recover \$17.5 million of the deferred balance during April 2014 through October 2014 and the remaining \$25.8 million beginning in November 2014, and the assumptions for the potential increase in estimated gas costs of \$37.4 million, the increase in GCR factor would be \$0.2037 per therm⁵ beginning November 1, 2014 and the increase in the annual bill of a typical residential heating customer using 846 therms per year would be \$172, or 15%.⁶

⁵ This value is calculated as \$51.3 million (total cost of \$68.8 million less \$17.5 million recovery beginning April 1, 2014) divided by annual normal sales of 260 million therms, and reflects the uncollectibles gross up of 3.18%.

⁶ The estimated dollar and percentage increases are based on the 2013-2014 annual residential heating bill of \$1,169 for customer using 846 therms.

PUC 1-4

Request:

Has the company met both its purchase and storage targets for the GCR period?

Response:

The Company has a hedge purchase target and a November 1 storage inventory target. The Company met or exceeded these targets as of November 1, 2013 for the GCR period November 1, 2013 through October 31, 2014.

The hedge purchase target is a percentage of all forecasted purchases based on normal weather. The hedge purchase target is 60% of the forecasted purchases in the months of April and October. The remaining ten months of the year have a hedge purchase target of 70% of the forecasted purchases. This hedge percentage is comparing the hedge volumes to the forecasted purchases and does not include storage, LNG, or discretionary hedges. In addition, the Company must also have a minimum of 80% of the forecasted normal weather requirements (firm sales) hedged in December, January, and February, and 75% of the forecasted requirements in November and March. This hedge percentage is comparing mandatory hedges, discretionary hedges, and forecasted underground storage and LNG withdrawals against the forecasted requirements. The November 1 storage inventory target requires the Company to have underground storage filled to 95% of the storage capacity for all fields except for the two Tennessee Gas Pipeline FSMA storage fields. The FSMA storage fields have a target of 80% of the storage capacity. The unfilled storage capacity is needed to manage daily swing requirements in November.

The volumes contained in the GCR filing are used to establish a commodity rate for the GCR year and do not represent purchasing targets. The volumes shown in the GCR filing are based on normal weather and are a result of using the SENDOUT model.

PUC 1-5

Request:

Please discuss the rationale behind the company's decision to include non-heating customers in the increase, when the under-collection was incurred during two heating seasons. Or, please justify why approximately half of the under-collection is proposed to be recovered during the non-heating season when the under-collection was incurred during the heating seasons of 2012/2013 and 2013/2014.

Response:

A major factor contributing to the \$34.5 million projected under-recovery of gas costs was the increase in the price of gas purchased. Since this purchased gas was more expensive than the forecasted gas cost used to calculate the current GCR factor approved by the PUC, and this gas was purchased on behalf of all customers, including residential non-heating customers, it is appropriate that all customers (both heating and non-heating) be assessed the proposed surcharge. This increase in gas cost is associated with the commodity component of the GCR factor, which is a uniform per-therm factor assessed to all customers. Therefore, since the commodity component of the GCR increased and all customers are assessed the uniform GCR factor, it is appropriate to apply this surcharge uniformly to all customers.

Customers are billed an annual GCR factor which results in billing customers an average commodity rate throughout the year. The current GCR mechanism does not attempt to reflect any seasonal variances in commodity prices and is not intended to match, on a monthly basis, gas cost incurred with gas cost recovery. The GCR mechanism is designed to recover current costs from current customers during an annual GCR period (November through October) and allows for interim adjustments to the GCR factor to minimize the recovery of current gas cost from future customers. In this filing, the Company is not attempting to match the recovery of gas costs based on the heating and non-heating seasons, but instead is attempting to match the recovery of current gas costs within the an annual GCR period. Since there is always some ebb and flow in the Company's firm sales customer base over time, the Company is proposing to adjust its current GCR factor to recover a portion of the projected under-recovery from the customers who were responsible for generating it. In other words, the Company is proposing to adjust its current GCR factor with the intent of recovering from its current firm sales customer base the gas costs associated with its actual and forecasted purchases on their behalf during the current GCR period ending October 2014. The Company is attempting to match the recovery of the increase in gas costs with those customers who have caused the Company to incur those costs. By deferring the recovery of the increased gas costs to a future period, there will likely be future firm sales customers who would be responsible for paying for gas costs which they did not cause the Company to incur nor did they receive the benefit of the gas associated with the increased cost.

The Narragansett Electric Company
d/b/a National Grid
In Re: Revised Gas Cost Recovery
Responses to Public Utilities Commission's First Set of Data Requests
Issued on March 5, 2014

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The Company believes that its proposal to recover approximately half of the projected under-recovery and delaying recovery of approximately \$17 million to the next GCR period reflects the Company's consideration of the timing of the need to adjust its GCR factor over the non-heating season and the resulting bill impacts associated with requesting recovery of the full amount by October 2014. The Company's proposal strikes a balance between the impact to customers of an increase in the GCR factor and the need for the Company to recoup cash it has paid to its suppliers for higher cost gas purchased on behalf of its firm sales customers.

PUC 1-6

Request:

Assuming the 16.3% increase in GCR costs, what is the bill impact to customers with the proposed April 1, 2014 ISR increase included in the analysis?

Response:

Please see Attachment PUC 1-6, which reflects the bill impact resulting from both the implementation of the proposed GCR factor and the proposed FY 2015 ISR factors. For a residential heating customer, the bill over the period April 2014 through October 2014 will increase from 16.3% to 17.2%.

Please note that the original bill impact analysis found in Attachment AEL-4 of the Company's February 14, 2014 filing included the proposed FY 2015 ISR factor in both the "Current Rates" and "Proposed Rates" columns. Therefore, although the bill increase in the "Difference" column (Proposed Rates vs. Current Rates) did not include the increase resulting from the proposed increase in the FY 2015 ISR factors, the total bill for the period April through October 2014 displayed in the column labeled "Proposed Rates" did reflect the proposed FY 2015 ISR factors.

National Grid - RI Gas
Gas Cost Recovery (GCR) Filing
Bill Impact Analysis with Various Levels of Consumption:

Line No.	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:					
						GCR	Base DAC	DAC	ISR	EE	GET
(1)											
(2)											
(3)											
(4)											
(5)	168	\$353.43	\$306.56	\$46.87	15.3%	\$43.38	\$0.00	\$2.08	\$0.00	\$0.00	\$1.41
(6)	185	\$379.24	\$327.63	\$51.61	15.8%	\$47.76	\$0.00	\$2.30	\$0.00	\$0.00	\$1.55
(7)	204	\$407.99	\$351.10	\$56.89	16.2%	\$52.66	\$0.00	\$2.52	\$0.00	\$0.00	\$1.71
(8)	221	\$433.83	\$372.17	\$61.66	16.6%	\$57.07	\$0.00	\$2.74	\$0.00	\$0.00	\$1.85
(9)	240	\$462.57	\$395.60	\$66.97	16.9%	\$61.97	\$0.00	\$2.99	\$0.00	\$0.00	\$2.01
(10)	Average Customer	\$489.55	\$417.63	\$71.93	17.2%	\$66.57	\$0.00	\$3.20	\$0.00	\$0.00	\$2.16
(11)	274	\$513.88	\$437.44	\$76.43	17.5%	\$70.75	\$0.00	\$3.39	\$0.00	\$0.00	\$2.29
(12)	294	\$543.86	\$461.81	\$82.05	17.8%	\$75.93	\$0.00	\$3.66	\$0.00	\$0.00	\$2.46
(13)	312	\$570.69	\$483.66	\$87.03	18.0%	\$80.56	\$0.00	\$3.86	\$0.00	\$0.00	\$2.61
(14)	328	\$594.63	\$503.13	\$91.51	18.2%	\$84.69	\$0.00	\$4.07	\$0.00	\$0.00	\$2.75
(15)	350	\$626.65	\$529.03	\$97.62	18.5%	\$90.37	\$0.00	\$4.32	\$0.00	\$0.00	\$2.93

Residential Heating:

Residential Heating Low Income:

Line No.	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:					
						GCR	Base DAC	DAC	ISR	EE	GET
(16)											
(17)											
(18)											
(19)											
(20)	168	\$336.03	\$289.16	\$46.87	16.2%	\$43.38	\$0.00	\$2.08	\$0.00	\$0.00	\$1.41
(21)	185	\$361.07	\$309.46	\$51.61	16.7%	\$47.76	\$0.00	\$2.30	\$0.00	\$0.00	\$1.55
(22)	204	\$388.98	\$332.09	\$56.89	17.1%	\$52.66	\$0.00	\$2.52	\$0.00	\$0.00	\$1.71
(23)	221	\$414.05	\$352.39	\$61.66	17.5%	\$57.07	\$0.00	\$2.74	\$0.00	\$0.00	\$1.85
(24)	240	\$441.95	\$374.98	\$66.97	17.9%	\$61.97	\$0.00	\$2.99	\$0.00	\$0.00	\$2.01
(25)	Average Customer	\$468.13	\$396.20	\$71.93	18.2%	\$66.57	\$0.00	\$3.20	\$0.00	\$0.00	\$2.16
(26)	274	\$491.75	\$415.32	\$76.43	18.4%	\$70.75	\$0.00	\$3.39	\$0.00	\$0.00	\$2.29
(27)	294	\$520.88	\$438.82	\$82.05	18.7%	\$75.93	\$0.00	\$3.66	\$0.00	\$0.00	\$2.46
(28)	312	\$546.94	\$459.91	\$87.03	18.9%	\$80.56	\$0.00	\$3.86	\$0.00	\$0.00	\$2.61
(29)	328	\$570.20	\$478.69	\$91.51	19.1%	\$84.69	\$0.00	\$4.07	\$0.00	\$0.00	\$2.75
(30)	350	\$601.36	\$503.74	\$97.62	19.4%	\$90.37	\$0.00	\$4.32	\$0.00	\$0.00	\$2.93

C & I Small:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:				EE	GET	
						GCR	Base DAC	DAC	ISR			
(61)												
(62)												
(63)												
(64)												
(65)	247	\$552.36	\$483.33	\$69.03	14.3%	\$63.77	\$0.00	\$3.19	\$0.00	\$0.00	\$2.07	
(66)	273	\$592.81	\$516.51	\$76.30	14.8%	\$70.48	\$0.00	\$3.53	\$0.00	\$0.00	\$2.29	
(67)	298	\$631.30	\$548.01	\$83.29	15.2%	\$76.95	\$0.00	\$3.84	\$0.00	\$0.00	\$2.50	
(68)	325	\$672.03	\$581.23	\$90.80	15.6%	\$83.90	\$0.00	\$4.18	\$0.00	\$0.00	\$2.72	
(69)	353	\$710.15	\$611.47	\$98.68	16.1%	\$91.17	\$0.00	\$4.55	\$0.00	\$0.00	\$2.96	
(70)	379	\$731.25	\$625.38	\$105.87	16.9%	\$97.79	\$0.00	\$4.90	\$0.00	\$0.00	\$3.18	
(71)	405	\$779.52	\$666.34	\$113.18	17.0%	\$104.55	\$0.00	\$5.23	\$0.00	\$0.00	\$3.40	
(72)	432	\$815.33	\$694.59	\$120.74	17.4%	\$111.54	\$0.00	\$5.58	\$0.00	\$0.00	\$3.62	
(73)	458	\$849.84	\$721.87	\$127.97	17.7%	\$118.23	\$0.00	\$5.90	\$0.00	\$0.00	\$3.84	
(74)	484	\$883.39	\$748.11	\$135.28	18.1%	\$124.98	\$0.00	\$6.24	\$0.00	\$0.00	\$4.06	
(75)	511	\$918.21	\$775.38	\$142.82	18.4%	\$131.95	\$0.00	\$6.59	\$0.00	\$0.00	\$4.28	

C & I Medium:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:				EE	GET	
						GCR	Base DAC	DAC	ISR			
(76)												
(77)												
(78)												
(79)												
(80)	2,748	\$4,361.08	\$3,602.11	\$758.97	21.1%	\$709.53	\$0.00	\$26.67	\$0.00	\$0.00	\$22.77	
(81)	3,043	\$4,775.36	\$3,934.91	\$840.45	21.4%	\$785.71	\$0.00	\$29.53	\$0.00	\$0.00	\$25.21	
(82)	3,338	\$5,189.33	\$4,267.42	\$921.91	21.6%	\$861.86	\$0.00	\$32.39	\$0.00	\$0.00	\$27.66	
(83)	3,634	\$5,604.84	\$4,601.18	\$1,003.66	21.8%	\$938.30	\$0.00	\$35.25	\$0.00	\$0.00	\$30.11	
(84)	3,930	\$6,020.03	\$4,934.60	\$1,085.43	22.0%	\$1,014.74	\$0.00	\$38.13	\$0.00	\$0.00	\$32.56	
(85)	4,226	\$6,435.80	\$5,268.54	\$1,167.26	22.2%	\$1,091.23	\$0.00	\$41.01	\$0.00	\$0.00	\$35.02	
(86)	4,522	\$6,850.76	\$5,601.85	\$1,248.91	22.3%	\$1,167.58	\$0.00	\$43.86	\$0.00	\$0.00	\$37.47	
(87)	4,819	\$7,267.23	\$5,936.30	\$1,330.93	22.4%	\$1,244.25	\$0.00	\$46.75	\$0.00	\$0.00	\$39.93	
(88)	5,114	\$7,681.50	\$6,269.08	\$1,412.42	22.5%	\$1,320.44	\$0.00	\$49.61	\$0.00	\$0.00	\$42.37	
(89)	5,410	\$8,096.72	\$6,602.56	\$1,494.16	22.6%	\$1,396.85	\$0.00	\$52.49	\$0.00	\$0.00	\$44.82	
(90)	5,705	\$8,510.99	\$6,935.35	\$1,575.64	22.7%	\$1,473.03	\$0.00	\$55.34	\$0.00	\$0.00	\$47.27	

C & I LLF Large:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:					
						GCR	Base DAC	DAC	ISR	EE	GET
(91)											
(92)											
(93)											
(94)											
(95)	11,454	\$17,407.78	\$14,266.80	\$3,140.98	22.0%	\$2,957.40	\$0.00	\$89.35	\$0.00	\$0.00	\$94.23
(96)	12,686	\$19,144.63	\$15,665.79	\$3,478.85	22.2%	\$3,275.53	\$0.00	\$98.95	\$0.00	\$0.00	\$104.37
(97)	13,920	\$20,883.90	\$17,066.66	\$3,817.24	22.4%	\$3,594.11	\$0.00	\$108.61	\$0.00	\$0.00	\$114.52
(98)	15,153	\$22,621.92	\$18,466.57	\$4,155.35	22.5%	\$3,912.49	\$0.00	\$118.20	\$0.00	\$0.00	\$124.66
(99)	16,388	\$24,362.35	\$19,868.31	\$4,494.04	22.6%	\$4,231.40	\$0.00	\$127.82	\$0.00	\$0.00	\$134.82
(100)	17,620	\$26,099.48	\$21,267.58	\$4,831.90	22.7%	\$4,549.50	\$0.00	\$137.44	\$0.00	\$0.00	\$144.96
(101)	18,853	\$27,837.28	\$22,667.28	\$5,170.00	22.8%	\$4,867.84	\$0.00	\$147.06	\$0.00	\$0.00	\$155.10
(102)	20,087	\$29,576.51	\$24,068.11	\$5,508.40	22.9%	\$5,186.46	\$0.00	\$156.69	\$0.00	\$0.00	\$165.25
(103)	21,321	\$31,316.09	\$25,469.31	\$5,846.78	23.0%	\$5,505.08	\$0.00	\$166.30	\$0.00	\$0.00	\$175.40
(104)	22,554	\$33,054.17	\$26,869.28	\$6,184.89	23.0%	\$5,823.43	\$0.00	\$175.91	\$0.00	\$0.00	\$185.55
(105)	23,787	\$34,792.22	\$28,269.19	\$6,523.03	23.1%	\$6,141.80	\$0.00	\$185.54	\$0.00	\$0.00	\$195.69

C & I HLF Large:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:					
						GCR	Base DAC	DAC	ISR	EE	GET
(106)											
(107)											
(108)											
(109)											
(110)	24,419	\$30,736.71	\$24,052.95	\$6,683.76	27.8%	\$6,304.98	\$0.00	\$178.27	\$0.00	\$0.00	\$200.51
(111)	27,050	\$33,912.25	\$26,508.36	\$7,403.90	27.9%	\$6,984.32	\$0.00	\$197.46	\$0.00	\$0.00	\$222.12
(112)	29,681	\$37,087.81	\$28,963.76	\$8,124.05	28.0%	\$7,663.65	\$0.00	\$216.68	\$0.00	\$0.00	\$243.72
(113)	32,309	\$40,260.05	\$31,416.71	\$8,843.34	28.1%	\$8,342.17	\$0.00	\$235.87	\$0.00	\$0.00	\$265.30
(114)	34,940	\$43,435.58	\$33,872.10	\$9,563.47	28.2%	\$9,021.51	\$0.00	\$255.06	\$0.00	\$0.00	\$286.90
(115)	37,570	\$46,609.98	\$36,326.61	\$10,283.37	28.3%	\$9,700.61	\$0.00	\$274.26	\$0.00	\$0.00	\$308.50
(116)	40,201	\$49,785.11	\$38,781.64	\$11,003.47	28.4%	\$10,379.90	\$0.00	\$293.47	\$0.00	\$0.00	\$330.10
(117)	42,830	\$52,958.42	\$41,235.37	\$11,723.05	28.4%	\$11,058.69	\$0.00	\$312.67	\$0.00	\$0.00	\$351.69
(118)	45,461	\$56,133.96	\$43,690.76	\$12,443.21	28.5%	\$11,738.04	\$0.00	\$331.87	\$0.00	\$0.00	\$373.30
(119)	48,091	\$59,308.42	\$46,145.35	\$13,163.06	28.5%	\$12,417.11	\$0.00	\$351.06	\$0.00	\$0.00	\$394.89
(120)	50,721	\$62,482.86	\$48,599.96	\$13,882.90	28.6%	\$13,096.15	\$0.00	\$370.26	\$0.00	\$0.00	\$416.49

C & I LLF Extra-Large:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:			EE	GET
						GCR	DAC	ISR		
(121)	50,011	\$65,001.62	\$51,570.86	\$13,430.76	26.0%	\$12,912.83	\$0.00	\$115.01	\$0.00	\$402.92
(122)	55,398	\$71,672.66	\$56,795.16	\$14,877.51	26.2%	\$14,303.76	\$0.00	\$127.42	\$0.00	\$446.33
(123)	60,784	\$78,342.64	\$62,018.73	\$16,323.91	26.3%	\$15,694.41	\$0.00	\$139.78	\$0.00	\$489.72
(124)	66,168	\$85,010.90	\$67,241.05	\$17,769.86	26.4%	\$17,084.57	\$0.00	\$152.19	\$0.00	\$533.10
(125)	71,556	\$91,682.98	\$72,466.12	\$19,216.86	26.5%	\$18,475.77	\$0.00	\$164.58	\$0.00	\$576.51
(126)	76,941	\$98,352.06	\$77,689.02	\$20,663.04	26.6%	\$19,866.20	\$0.00	\$176.95	\$0.00	\$619.89
(127)	82,327	\$105,021.94	\$82,912.51	\$22,109.43	26.7%	\$21,256.82	\$0.00	\$189.33	\$0.00	\$663.28
(128)	87,712	\$111,691.23	\$88,135.58	\$23,555.65	26.7%	\$22,647.25	\$0.00	\$201.73	\$0.00	\$706.67
(129)	93,098	\$118,361.24	\$93,359.15	\$25,002.08	26.8%	\$24,037.89	\$0.00	\$214.13	\$0.00	\$750.06
(130)	98,485	\$125,032.26	\$98,583.43	\$26,448.82	26.8%	\$25,428.83	\$0.00	\$226.53	\$0.00	\$793.46
(131)	103,870	\$131,701.21	\$103,806.22	\$27,894.99	26.9%	\$26,819.24	\$0.00	\$238.90	\$0.00	\$836.85

C & I HLF Extra-Large:

	April - October Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Difference due to:			EE	GET
						GCR	DAC	ISR		
(136)	235,275	\$262,018.29	\$198,663.84	\$63,354.45	31.9%	\$60,748.00	\$0.00	\$705.82	\$0.00	\$1,900.63
(137)	260,613	\$289,905.88	\$219,728.43	\$70,177.45	31.9%	\$67,290.27	\$0.00	\$781.86	\$0.00	\$2,105.32
(138)	285,950	\$317,792.90	\$240,792.75	\$77,000.14	32.0%	\$73,832.29	\$0.00	\$857.85	\$0.00	\$2,310.00
(139)	311,287	\$345,679.49	\$261,856.64	\$83,822.86	32.0%	\$80,374.30	\$0.00	\$933.87	\$0.00	\$2,514.69
(140)	336,624	\$373,566.03	\$282,920.48	\$90,645.55	32.0%	\$86,916.31	\$0.00	\$1,009.87	\$0.00	\$2,719.37
(141)	361,962	\$401,453.88	\$303,985.37	\$97,468.52	32.1%	\$93,458.57	\$0.00	\$1,085.89	\$0.00	\$2,924.06
(142)	387,299	\$429,340.68	\$325,049.45	\$104,291.24	32.1%	\$100,000.60	\$0.00	\$1,161.90	\$0.00	\$3,128.74
(143)	412,637	\$457,228.27	\$346,114.06	\$111,114.21	32.1%	\$106,542.87	\$0.00	\$1,237.91	\$0.00	\$3,333.43
(144)	437,974	\$485,115.27	\$367,178.38	\$117,936.90	32.1%	\$113,084.87	\$0.00	\$1,313.92	\$0.00	\$3,538.11
(145)	463,311	\$513,001.85	\$388,242.24	\$124,759.61	32.1%	\$119,626.89	\$0.00	\$1,389.93	\$0.00	\$3,742.79
(146)	488,649	\$540,889.89	\$409,307.28	\$131,582.61	32.1%	\$126,169.18	\$0.00	\$1,465.95	\$0.00	\$3,947.48