

Human Resources Costs

Reference: Ex. B, Tab 4, Schedule 2, page 1

1. Please provide the main drivers behind the substantial 2011 increase in Human Resources cost.
 - a. For each driver, please provide if this factor is a one year phenomenon or the trend is expected into 2012 and beyond.
 - b. To the extent possible, please explain what EGD is doing to mitigate these increases in 2012 and beyond.
 - c. Please break out from each of the respective years from 2007 Board-approved to 2011, the actual amount of performance based incentives.
 - i. Please provide the details on any significant change to EGD performance based incentive programs during the Incentive Regulation term.

Transactional Services

Reference: Ex. C., Tab 2, Schedule 2, page 3, Line 1, Column 3
and

EB-2007-0615 Decision and Order, May 15, 2008, Appendix E, page 6, paragraph 3

Preamble: Net revenue is defined as gross revenues for providing these services less any direct incremental costs incurred, plus, any avoided costs. Direct incremental costs represent those direct costs incurred as a result of a transactional service activity and avoided costs are those costs that have been avoided as a result of a transactional service activity. Typical direct incremental costs and avoided costs would include transportation costs, fuel costs, charges for name changes, re-direct charges, etc.

2. We require additional information regarding the inputs into the figure provided.
 - a. Please provide a definition for the acronym "WBT" and how it is included or excluded in the derivation of your figures.
 - b. Please confirm that this figure is a net revenue figure as described in the preamble above.
 - c. Please disaggregate the Sales and WBT figure into amounts for different categories of transactional services:
 - i. Base exchanges
 - ii. FT-RAM company utilization
 - iii. FT-RAM assignment
 - iv. Other categories.
 - d. Please provide a definition for each of the categories.
 - e. For each of the categories in c., please provide the quantity of:
 - i. gross revenue

- ii. direct incremental costs
 - iii. avoided costs
 - f. For each of the above categories, and sub-categories as appropriate, please provide an example(s) of a specific transactions showing how the net revenue is determined by the process of adjustments for direct incremental costs and avoided costs. To be clear, please provide actual examples of the different types of transactions that contribute to each of the categories to demonstrate where the costs come from and where they are borne.
3. Please provide the answers to interrogatories provided in EB-2011-0354 under Issue D.2 (pages 12-19) that have import into the current proceeding. In those questions, where a period was defined as April to March for purposes of understanding a gas year, please use January to December to understand fiscal year implication. In our view, that includes to all interrogatories in the section with the exception of Questions 1, 5 a) and b), 9 and 10.

Unaccounted for Gas (UFG)

Reference: Exhibit C, Tab 2, Schedule 2, Page 1

4. For each of the years starting with Board Approved 2007, please provide the actual and forecasted broken down by:
- a. number of units of UFG
 - b. price of each unit
 - c. total resulting cost

All of which is respectfully submitted on behalf of FRPO,



Dwayne R. Quinn
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