

**REF: Exhibit B, Tab 2, Schedule 4, Page 1 of 4**

- 1) Please provide the contributing factors to the more than 20 % increase in the system reinforcement expenditures?

**REF: Exhibit B, Tab 3, Schedule 1, Page 5 of 5**

- 2) Please break-out the components of the \$27.7 M of Miscellaneous Revenue providing at least the amount from Non-utility storage.

**REF: EB-2012-0046, Exhibit C, Tab 1, Schedule 6, Page 6 of 21**

- 3) Please provide all relevant internal emails, memos, correspondence and including any presentations to Senior management or EGD Board of directors that pertained to the decision not to follow the Board's decision in EB-2012-0055 ordering the treatment of FT-RAM and other upstream optimizations as reductions to gas costs.

**REF: EB-2012-0046, Exhibit C, Tab 1, Schedule 6, Page 6 of 21**

- 4) Please provide an organizational chart showing the position titles.
- a) Does position responsible for overall responsibility for the Gas Supply and Gas Control Group (GCG) have compensation tied to Transaction Service Margin?
- 5) During the winter months, does GCG release any monthly or weekly transport? If so, what is the longest lead time for each term prior to flow date?
- a) For each month of the 2012 winter, please provide the quantities of TCPL long-haul transport released by delivery area and the date released.
- 6) Please update (up to March 2013) and produce the table in the attachment to the response to FRPO IR in EB-2011-0354 at Issue D2 Schedule 8.6.

**REF: Exhibit C, Tab 1, Schedule 6, Page 10 of 21**

- 7) Please provide a table for each winter month of 2011 and 2012 showing the: total transport capacity held and the amount released including the term (seasonally, monthly, weekly, daily) and the date it was released.
- a) Please provide the EGD data (forecasted degree days, expected daily consumption to the market area released) that was used for the each of the capacity releases. If this request is

too onerous, please provide for each term (seasonal, month, week, daily) each month, the data that supported the longest lead time between transaction and scheduled flow.

- 8) How much spot gas or landed gas did EGD buy in the summer of 2012 that was not supplied by a firm transportation contract (and not as a result of an assignment or exchange)?

**REF: Exhibit C, Tab 1, Schedule 6, Page 13 of 21**

- 9) How does EGD recover STS costs in rates i.e. please specify who pays for the demand charges and through what rates?

- 10) Please update and produce the Table generated in the attachment to EB-2011-0354 interrogatory response Exhibit I, Issue C6, Schedule 4.1 providing detail on the monthly collection of STS-RAM credits and their application to IT.

- a) As an additional column to the above requested table, please provide the dollar value of STS-RAM credits applied to optimization and those that were not used.
- b) Please update and produce the Summary Table in part i) of the same above interrogatory showing a summary of the use of Total RAM credits.

**REF: Exhibit C, Tab 1, Schedule 6, Page 15 of 21**

11) Is the statement in the last sentence of paragraph 23 still true if EGD receives the 10% ordered in the EB-2012-0055 decision? If not, why not?

**REF: Exhibit C, Tab 1, Schedule 6, Page 17 of 21**

12) Please provide the monthly STS withdrawal rights balance at the end of each month of the IRM period.

**REF: Exhibit C, Tab 1, Schedule 6, Page 18 of 21**

Preamble: EGD states: This option would involve no transactional service transaction and would not create any financial benefit to the ratepayer or the shareholder.

13) Does EGD rely on STS injections during the summer and would the first option create STS injections?

a) If so, please explain why these injections are not a financial benefit to ratepayer?

**REF: Exhibit C, Tab 1, Schedule 6, Page 20 of 21**

14) Please provide Appendix D

15) Please provide Option 5 showing the impacts of using the Board approved methodology in  
EB-2012-0055.

**REF: Exhibit C, Tab 2, Schedule 2, Page 3 of 6**

16) Please provide a much more signification explanation regarding how the allocation of this  
cost is developed (especially for SSM and AUTVA).