

*Lost Revenue Adjustment Mechanism Variance Account*

Ref: Exhibit A, Tab 1, Appendix A, Schedule 4 Page 2

Please explain why the 2011 LRAM amounts, for most classes, are materially higher than the 2012 amounts.

*Demand Side Management Variance Account*

Ref: Exhibit A, Tab 1, Appendix A, Schedule 5

Exhibit A, Tab 1, Appendix A, Schedule 5 indicates that, with respect to the variance between the settled 2012 DSM budgets in EB-2011-0327 and the actual 2012 DSM budgets, 4 rate classes experienced a decrease in DSM spending, 4 classes experienced an increase in DSM spending ranging from 1.3% to 39.1%, and the M4 class experienced an increase in DSM spending of 72.3%.

- a) Please confirm OGVG's understanding that it is Union's position that a 72.3% increase in the DSM budget allocated to the M4 class as between the originally 2012 budgeted amount of \$1,572,105 and the actual 2012 amount of \$2,708,435 is permissible pursuant to page 4 of the Settlement Agreement in EB-2011-0327 dated January 31, 2012.
- b) OGVG is interested in understanding how much of each rate class' costs are DSM related, particularly in view of the increase (72.3%) in the DSM costs allocated to the M4 class in 2012. Please express, by rate class, the percentage of the total claimed 2012 distribution costs that are made up of the combination of 2012 DSM and DSM Incentive Amounts, including the amounts claimed within the relevant 2012 deferral and variance accounts. Please also include the number of customers per class for 2012, as well as the subset of customers within the class (expressing that subset both in actual numbers and as a percentage of the total number of customers in the class) that participated in 2012 DSM programs. Please provide the analysis in table form and include all base numbers and references for the sources of those numbers in the table.

*FT-RAM Related Transportation Exchange Services*

Ref: Exhibit B, Tab 2, page 13 lines 18-19

“All FT-Ram related transportation exchange services in 2012 were sold on a daily, monthly, or seasonal basis. There were no annual transactions.”

- a) Please provide a table showing all of the FT-RAM related transportation exchange services for 2012 that includes:
  - i) the date the transaction was made,

- ii) the day, month, or season (the first and last day of the transaction period plus the total number of days)the transaction related to,
  - iii) the particular resource that was sold,
  - iv) the net value of the transaction (with all transactions presumed to total \$37.3M)
- b) In EB-2011-0210, Exhibit J3.1 Union provided a graph illustrating, in part, the difference between Union's contracted capacity and Union's contracted capacity net of annual assignments. Please provide a similar graph for the year 2012, but instead of showing contracted capacity net of annual assignments (of which Union has stated there were none), provide a line indicating the contracted capacity net of the seasonal assignments referred to at Exhibit B, Tab 2, page 9, Table 1 line 6 totaling \$25.9M.