4.2-FRPO-81-85

REF: Ex. 4, Tab 2, Schedule 1, Attachment 6

81) Please provide the commercial arrangements and instructions associated with the ICF study in Attachment 6 including but not limited to:
   a) The RFP, if any.
      i) If there was no RFP, the over-arching contract under which this study was undertaken.
   b) The terms of engagement.
      i) If no specific terms of engagement, the documentation from the company to ICF detailing the analysis that was being requested.
   c) All written documentation between EGI and ICF associated with feedback, edits, revisions and/or further instructions.
   d) Specifically, did the company ask ICF to consider and analyze the opportunity to purchase winter month deliveries at a price that was fixed months, or longer in advance as part of the load-balancing portfolio?
      i) If so, please file that analysis.
      ii) If not, why not?
   e) Please provide the final cost to generate the study.
      i) Please provide the cost to generate the report for filing with the EGI evidence package.
      ii) Please provide the hourly rate(s) of ICF to provide:
         (1) Assistance with Interrogatory Responses
         (2) Testimony at the Technical Conference
         (3) Testimony at the Oral Hearing

Preamble: On pg. 5 of the Attachment, the study states: *We also tested each weather scenario using a lower storage capacity gas supply scenario developed with 5 PJ less storage than indicated by the Aggregate Excess methodology to evaluate the impacts of replacing storage capacity with winter purchases at Dawn on supply portfolio costs.*

82) For the purposes of determining cost impacts, when was it assumed that the price of the gas would be fixed:
   a) On the day needed, week ahead of the forecasted need, month ahead of the forecasted need, etc.
   b) What is the maximum amount of time that EGI fixes the price for the delivery of gas:
      i) At Dawn?
      ii) At other supply receipt points?

c) When the study uses the term "supply portfolio costs," please explain the presumed allocation of costs for these winter purchases (e.g., landed gas cost, separation of costs between commodity and other accounts, etc.).

Preamble: The ICF study is dated October 12, 2002 and Exhibit 2-10 is entitled ICF's April 2022 Base Case.

83) For Exhibit 2-10, please distinguish the date of the graph to distinguish between prices that are historical and what are forecast.

84) For Exhibit 4-1, please:

a) Confirm that the HDD's are on the basis of degrees Fahrenheit.
b) Explain how the location is derived (i.e., specific city, geographical area, population or consumption weighted, etc.).

Preamble: On pages 68-69, the study estimates: *Using the ICF assessment of the likely cost of deliverability associated with high deliverability storage ICF estimated an initial cost of delivered services at $3.72/GJ/Day for 10 days of delivered services.*

The study goes on estimating the incremental storage value in the remaining pages.

85) Please provide the complete derivation of the estimated cost including the sources of data and assumptions made.

a) Please ensure the derivation includes stated $0.41/GJ and the formula in footnote 35.
b) Please provide Appendix D referred to later on the same page.
c) In comparing the information in footnote 36 (the Storage Revenue Report) and footnote 37 (the Storage Parameter Report), it is clear there is no observable linkage between the revenue generated and the parameters associated with the specific contract.
    i) How did ICF make that linkage for the purpose of the analysis?
    ii) Would the source of that linkage be available to those using those sources as accessed on EGI's website?
        (1) If not, why not?
    iii) While these reports are available through the hyperlinks provided by the study, does EGI provide access to historic indices of customers with this data?
        (1) If not, why not?
d) The Storage Parameter Report provides contract identifiers with acronyms LST and LTP.
    i) Please distinguish these type of contracts
    ii) Are there any LTP contracts that provide proportional deliverability to the current balance in storage?

(1) If so, how is the Maximum Firm Daily Withdrawal reported for those customers.
(2) How were the unit cost/deliverability used in the ICF analysis for those customers?

e) Please explain the absence of any storage contracts with deliverability between 1.2% and 1.8% in Exhibit E 1 that are evident in the Storage Parameter Report that is referenced in footnote 37.
   i) Please provide an updated graph of Exhibit E
f) Please provide a full derivation of the incremental storage value including source of data and assumptions made.

4.3-FRPO-86

REF: Ex. 4, Tab 3, Schedule 1

86) For the data in Table 7 regarding annual adjustments for storage pool inventories, please provide:
a) A more fulsome description of the process to determine these adjustments.
b) For the years since 2002, please provide the actual annual adjustments by utility/rate zone storage space and:
   i) Since 2007, the adjustments broken down between the utility and non-utility storage space.