

NEW HAMPSHIRE GAS CORPORATION

Summer 2011 Cost of Gas Rate

Direct Testimony of Brian R. Maloney

1 **Q. Please state your name, employer and business address.**

2 A. My name is Brian R. Maloney. I am employed by Rochester Gas and Electric
3 Corporation (“RG&E”) and my business address is 89 East Avenue, Rochester,
4 NY 14649.

5

6 **Q. What is your position?**

7 A. I am a Lead Analyst in the Rates and Regulatory Economics Department.

8

9 **Q. Please briefly describe your educational and professional background.**

10 A. I graduated from the Rochester Institute of Technology with a Bachelor of
11 Science degree in Business Administration. I joined RG&E in 2000 as an Analyst
12 in the Corporate Accounting Department, and transferred as a Lead Analyst to the
13 Rates and Regulatory Economics Department in 2004. Prior to joining RG&E, I
14 held financial analysis positions in the banking and telecommunications
15 industries.

16

17 **Q. Please summarize your responsibilities.**

18 A. My primary responsibilities consist of financial reporting, analysis and forecasting
19 of RG&E gas revenues and margins. In addition, I prepare testimony and exhibits
20 for RG&E Gas rate cases and develop delivery rate design proposals for such
21 cases, perform monthly unbilled and deferred revenue calculations for posting to
22 the general ledger, and file various monthly and annual reports with governmental
23 agencies. Recently, I assumed responsibility for the several of the regulatory
24 requirements for New Hampshire Gas Corporation (“NHGC” or the “Company”) related to the seasonal cost of gas (“COG”) filings and reconciliations, monthly
25 COG adjustments, and monthly income statements.
26

1

2 **Q. Have you testified as a witness in any proceedings involving either company?**

3 A. I have testified as a witness before the New York Public Service Commission in
4 each of the last three RG&E delivery rate cases in 2002, 2004, and 2010,
5 primarily on the topics of gas revenue forecasts and gas delivery rate design. I
6 have not testified before the New Hampshire Public Utilities Commission (the
7 “Commission” or “PUC”).

8

9 **Q. What is the purpose of your testimony in this proceeding?**

10 A. The purpose of my testimony is to explain the calculation of the Cost of Gas Rate
11 to be billed from May 1, 2011 to October 31, 2011. My testimony will also
12 discuss bill impacts, the temporary closure of Selkirk terminal, and the Propane
13 Purchasing Stabilization Plan.

14

15 **COST OF GAS ADJUSTMENT**

16

17 **Q. Please explain the calculation of the Cost of Gas Rate on the proposed 48th**
18 **revised Tariff Page 25.**

19 A. The proposed 48th revised Tariff Page 25 contains the calculation of the 2011
20 Summer COG rate and summarizes the Company's forecast of propane sendout
21 and propane costs. The estimated total cost of the forecasted propane sendout
22 from May 1, 2011 through October 31, 2011 is \$534,401. The information
23 presented on the tariff page is supported by Attachments A through E which will
24 be described later in this testimony.

25

26 To derive the Total Anticipated Period Costs, the following adjustments have
27 been made:

28 1) The prior period under-collection of \$10,753 is added to the forecasted
29 propane costs. This calculation of the under-collection is demonstrated on
30 Attachment D.

31

1 2) Interest of (\$649) is added to the forecasted propane costs. Attachment C
2 shows this forecasted interest calculation for the period November 2010
3 through October 2011. The interest calculation is based on the Wall Street
4 Journal's posted prime rate.

5
6 The cost of gas rate of \$1.8233 per therm is calculated by dividing the forecasted
7 Total Anticipated Period Costs of \$544,505 by the forecasted firm sales of
8 298,632 therms.

9
10 **Q. Please describe Attachment A.**

11 A. This attachment converts the produced gas costs to therms. The 321,271 therms
12 represent propane sendout as detailed on Attachment B, and the unit cost of
13 \$1.6634 per therm represents the average cost per therm for the summer season as
14 detailed on line 63 of Attachment E.

15
16 **Q. What is Attachment B?**

17 A. Attachment B represents the under/(over) collection calculation for the 2011
18 summer period based on the anticipated volumes, the cost of gas, and applicable
19 interest charges. As shown on line 3, total forecasted sendout is the 2010 weather
20 normalized summer period firm sendout plus the 2010 summer period company
21 use. Forecasted firm sales shown on line 8 are the 2010 summer period weather
22 normalized firm sales.

23
24 **Q. Are unaccounted-for gas volumes included in the filing?**

25 A. Unaccounted-for gas volumes are included in the firm sendout volumes on line 1
26 and are displayed on line 4 of Attachment B. The Company continues to actively
27 monitor its level of unaccounted-for volumes, which amounted to 1.66% on the
28 most recent DOT report for the year ended June 30, 2010.

29

1 **Q. How is Attachment C represented in the COG calculation?**

2 A. Attachment C represents the COG interest calculation through October 2011. The
3 net cost of the prior period under-collection plus interest is also included on the
4 tariff page.

5
6 **Q. What is Attachment D?**

7 A. Attachment D is the actual over-collection balance for the prior period May 2010
8 through October 2010, including interest. The ending under-collected balance of
9 \$10,753 is included on line 1, column 1, of Attachment C.

10
11 **Q. Please describe Attachment E.**

12 A. Attachment E is a forecast of the weighted-average cost of propane in inventory
13 through October 2011. This attachment is important as the cost of propane sold
14 includes spot market propane as well as propane withdrawn from storage.

15
16 **COG RATE AND BILL COMPARISONS**

17
18 **Q. How does the proposed 2011 summer COG rate compare with last summer's
19 COG rate?**

20 A. The projected summer 2011 COG rate of \$1.8233 is an increase of \$0.1424 per
21 therm from the average summer 2010 COG rate of \$1.6809. As shown on
22 Supplemental Schedules A and B, for the average residential heat and hot water
23 customers, this would be a \$45.29 increase for the summer 2011 period for the
24 gas component of their bills, which is an 8.5% increase. If the Monthly Customer
25 Charge, per therm Delivery Rates and Rate Case Surcharge are factored into the
26 analysis, the customer will see an increase of \$33.80 in their total bills for the
27 period, which is a 3.6% increase.

28

1 **Q. What is the primary reason for the \$0.1424 per therm summer COG**
2 **increase?**

3 A. The principal reason for the increase is higher projected spot market prices of
4 propane versus the summer 2010 period.

5
6 **Q. How were the gas prices determined?**

7 A. The gas prices were determined from the Spot Market Purchase Cost Analysis
8 included as Supplemental Schedule C. The spot market prices are based on Mt.
9 Belvieu monthly propane futures market quotations as of March 16, 2011, plus
10 broker, pipeline, Propane Education Research Council ("PERC"), and trucking
11 fees.

12
13 **Q. What amount of propane was pre-purchased?**

14 A. The Company has not made any pre-purchases for the 2011 summer COG period.

15
16 **Q. Has there been any impact on pipeline, PERC or trucking fees on NHGC's**
17 **cost of gas?**

18 A. Pipeline fees and PERC fees are unchanged from the end of the 2010 Summer
19 COG period at \$0.1125 per gallon and \$0.0040 per gallon respectively. Trucking
20 fees are forecasted at \$0.0753 per gallon, up from \$0.0699 at the end of the 2010
21 Summer COG period, due to higher fuel surcharges.

22
23 **MISCELLANEOUS**

24
25 **Q. Please provide a timeline of events at the Selkirk terminal and the impact on**
26 **supply sources.**

27 A. Enterprise TE's propane pipeline terminal in Selkirk, NY and two other terminals
28 downstream of Watkins Glen, NY were shut down on August 27, 2010 due to a
29 propane leak discovered in Gilboa, NY. After corrective action and testing, the
30 Selkirk terminal returned to service in early February 2011, and the Company was
31 able to resume full allocations from there on March 4. The Company's supply

1 from the time of closure through January was primarily sourced at the Watkins
2 Glen terminal, approximately 165 miles away from Selkirk. In February, the
3 Company's supply primarily came from Enterprise TE's Oneonta, NY terminal,
4 which re-opened prior to Selkirk. A limited amount of propane was also obtained
5 from Hartford Mills, NY and Canada.

6

7 **Q. What was the impact on gas costs of the closure of the Selkirk terminal?**

8 A. Total freight and wait time charges on contract purchases for November 2010 to
9 February 2011 were \$90,600 on deliveries of 545,000 gallons, equating to \$0.166
10 per gallon or \$0.181 per therm. In the prior winter with a fully operational
11 Selkirk terminal, total freight and wait time charges on contract purchases for
12 November 2009 to February 2010 were \$10,500 on deliveries of 510,000 gallons,
13 equating to \$0.021 per gallon or \$0.023 per therm. As such, the impact on
14 contract gas costs of the Selkirk terminal closure can be estimated at
15 approximately \$0.145 per gallon (\$0.158 per therm) for the first four months of
16 the winter period. Similar detail cannot be compiled for spot purchases because
17 freight charges are embedded in the spot price, but it can be assumed that those
18 prices were impacted by a comparable amount.

19

20 **Q. Has the Company performed any analysis regarding its Propane Purchasing
21 Stabilization Plan?**

22 A. Yes. The Company evaluated the estimated premium associated with securing the
23 pre-purchased volumes (Supplemental Schedule E), and the contracted price
24 versus the average monthly spot price for deliveries during the months of
25 November 2010 through February 2011 (Supplemental Schedule F). First,
26 concerning the estimated premium associated with securing the pre-purchased
27 volumes, the Company believes that the premium of \$0.0597 per gallon was
28 reasonable. This premium represents approximately 4.2% of the cost of the pre-
29 purchased gallons. Second, with regards to the comparison of the contracted
30 all-in price versus the average price of monthly spot deliveries, the analysis shows
31 that the cost of the pre-purchased gallons was approximately 15% lower than the

1 average spot prices incurred over the November 2009 through February 2010
2 period. The Company believes the Plan should continue. The purpose of the Plan
3 is to provide more stability in the winter COG rate by systematically purchasing
4 supplies over a predetermined period, not necessarily to obtain lower prices. The
5 systematic pre-purchases also facilitate the offering of a Fixed Price Option
6 program.

7

8 **Q. Has the Company issued a Request for Proposal (“RFP”) to potential**
9 **suppliers for the 2011-2012 period?**

10 A. Yes, the Company issued an RFP to five potential suppliers on February 28, 2011.
11 Two responded with legitimate proposals by the March 10 deadline. The
12 Company will evaluate the merits of the proposals prior to the summer cost of gas
13 hearing.

14

15 **Q. Is the Company requesting a waiver of N.H. Code Admin. Rule Puc 1203.05**
16 **which requires rate changes to be implemented on a service-rendered basis?**

17 A. Yes, the Company is requesting a waiver of N.H. Code Admin. Rule Puc 1203.05
18 as was granted in previous COG and delivery rate proceedings. First, NHGC
19 customers are accustomed to rate changes on a bills-rendered basis and an
20 alteration in policy may result in customer confusion. Second, the Company’s
21 billing system is not designed to accommodate a change to billing on a service-
22 rendered basis, and such a change would necessitate the modification or
23 replacement of that system at a substantial cost to NHGC.

24

25 **Q. Does this conclude your testimony?**

26 A. Yes, it does.