

Granite State Electric Company d/b/a National Grid

Default Service

For the Period Beginning
February 1, 2011

Testimony and Schedules
of
Margaret M. Janzen
and
John O. Leana

December 13, 2010

Submitted to:
New Hampshire Public Utilities Commission
Docket No. 10-020

Submitted by:

nationalgrid

DIRECT TESTIMONY
OF
MARGARET M. JANZEN
AND
JOHN O. LEANA

Table of Contents

I. Introduction..... 1

II. Purpose of Testimony 4

III. Bidding Process 5

IV. Results of Bidding 7

V. Renewable Portfolio Standard..... 8

VI. Default Service Commodity Costs and Retail Rates..... 12

VII. Tewksbury Meter Update 14

VIII. Conclusion 18

1 **I. Introduction**

2 Margaret M. Janzen

3 Q. Please state your name and business address.

4 A. My name is Margaret M. Janzen, and my business address is 100 East Old Country Road,
5 Hicksville, NY 11801.

6
7 Q. Please state your position.

8 A. I am the Director of Electric Supply and Distributed Generation for National Grid USA
9 Service Company, Inc. I oversee the procurement of energy, capacity and ancillary
10 services, portfolio hedging strategies and other energy supply related activities, as well as
11 the interconnections of unaffiliated generating units to the electric distribution systems,
12 for National Grid's operating companies, including Granite State Electric Company d/b/a
13 National Grid ("Granite State" or "Company"). For Granite State, these activities include
14 the procurement of power for Default Service as well as the procurement of renewable
15 energy certificates ("RECs").

16
17 Q. Will you describe your educational background and training?

18 A. I graduated from The Cooper Union in 1993 with a Bachelor of Engineering in Civil
19 Engineering. I received a Masters in Business Administration in Finance from Baruch
20 College in 2000.

21
22 Q. What is your professional background?

1 A. In July 1993 I joined the Brooklyn Union Gas Company as a Management Trainee and
2 Associate Engineer in the Project Engineering Department. In September 1997 I
3 accepted a position as an analyst in the Strategic Planning Department, and the name of
4 the company was changed to KeySpan Corporation. In August 1999 I became Manager
5 of the Capital Markets group in the Treasury Department and was responsible for
6 hedging of the corporate bond portfolio as well as new equity and debt issuances for
7 KeySpan. In August 2003 I moved to the Investor Relations Department, providing
8 financial and strategic information regarding the company to the investment community.
9 In March 2006 I joined the Regulatory Department and became Manager of the Gas
10 Pricing group, working on gas rate cases, regulatory mechanisms, implementation and
11 compliance. In March 2008 I accepted my current position of Director of Electric Supply
12 and Distributed Generation.

13
14 Q. Have you previously testified before the New Hampshire Public Utilities Commission
15 (“Commission”)?

16 A. Yes.

17
18 Q. Have you testified before any other state regulatory agencies?

19 A. Yes. I have testified before the Rhode Island Public Utilities Commission regarding
20 electric supply procurement activities.

21
22 John O. Leana

23 Q. Please state your name and business address.

1 A. My name is John O. Leana and my business address is 300 Erie Boulevard West,
2 Syracuse, New York 13202.

3
4 Q. Please state your position and responsibilities.

5 A. I am the Director of Meter Data Services and have responsibility for electric and gas
6 retail and wholesale meter data collection and management, electric wholesale market
7 settlement; and load research for National Grid USA's electric operations. With respect
8 to electric wholesale market settlement, I am responsible for overseeing the energy and
9 ICAP settlements for the New England and New York wholesale and retail markets,
10 which are upstate and downstate New England and the New York markets.

11
12 Q. Will you describe your educational background and training?

13 A. I received a Bachelor of Science Degree from Clarkson University in 1988 and a Master
14 of Science Degree in Electrical Engineering from the same institution in 1989. In 1998 I
15 graduated from Oswego State University with a Master of Science Degree in Business
16 Administration.

17
18 Q. What is your professional background?

19 A. In 1989, I joined Niagara Mohawk Power Corporation ("Niagara Mohawk") and have
20 held various positions of increasing responsibility with Niagara Mohawk and National
21 Grid USA in the areas of Transmission Planning, Corporate Planning, Finance, Merger
22 Integration, and Credit and Collections. I assumed my current role as director of Meter
23 Data Services in 2007.

1 Q. Have you previously testified before the New Hampshire Public Utilities Commission
2 (“Commission”)?

3 A. No.
4

5 Q. Have you testified before any other state regulatory agencies?

6 A. Yes. I have testified before the New York Public Service Commission.
7

8 **II. Purpose of Testimony**

9 Q. Ms. Janzen, what is the purpose of your testimony?

10 A. The purpose of my testimony is to request approval of the Default Service rates for the
11 Large and Medium Commercial and Industrial Customer Group (“Large Customer
12 Group”¹) resulting from Granite State’s recent procurement of Default Service power
13 supply. To support this request, I will describe the process used by Granite State to
14 procure Default Service for the Large Customer Group for the three-month period
15 February 1, 2011 through April 30, 2011. My testimony presents Granite State’s
16 proposed Default Service rates, including rate adjustments, for usage on and after
17 February 1, 2011, in accordance with the Default Service Adjustment Provision and
18 Default Service Cost Reclassification Adjustment Provision of the Company’s tariff, and
19 the Settlement Agreement in Docket No. DE 05-126, approved by Order No. 24,577
20 (January 13, 2006) (“Settlement Agreement”). My testimony will also describe how the
21 Company proposes to meet the Renewable Portfolio Standard obligation.

22 Q. Mr. Leana, what is the purpose of your testimony?

¹ Customers taking service under General Long-Hour Service Rate G-2 or General Service Time-Of-Use Rate G-1 of

1 A. The purpose of my testimony is to provide an update on the replacement of the meter at
2 the Tewksbury Substation.

3
4 **III. Bidding Process**

5 Q. Why does Granite State need to procure Default Service for the Large Customer Group
6 for the period beginning February 1, 2011?

7 A. Granite State's currently effective Default Service supply contract for the Large
8 Customer Group expires on January 31, 2011. Therefore, to assure that Default Service
9 will continue to be available to these customers, Granite State requires a new Default
10 Service supply arrangement beginning February 1, 2011.

11
12 Q. Please describe the process Granite State used to procure its Default Service supply.

13 A. Granite State conducted the procurement of Default Service supply in accordance with
14 applicable law including Granite State's Second Amended Restructuring Settlement
15 Agreement ("Restructuring Settlement"), RSA 374-F (the "New Hampshire Act"), and
16 the terms of the Settlement Agreement approved by the Commission pursuant to Order
17 No. 24,577 issued on January 13, 2006 in Docket No. DE 05-126² (the "Order"). Granite
18 State and its retail distribution affiliates in Massachusetts, Massachusetts Electric
19 Company and Nantucket Electric Company (together "Mass. Electric") (all three
20 companies together "National Grid"), issued a joint request for proposals ("RFP") for

the Company's Retail Delivery Tariff.

² The Order granted Granite State's August 1, 2005 Petition for Post-Transition Service Default Service Proposal as amended by the Post-Transition Service Default Service Proposal Settlement Agreement filed with the Commission on November 18, 2005 ("Settlement Agreement"). Granite State's original proposal filed August 1, 2005 and the subsequent Settlement Agreement will together be referred to as the "Settlement Agreement" throughout my testimony.

1 certain power supply services (including Granite State's Default Service) from suppliers.

2 The RFP sought a supply for Granite State's Default Service and a portion of Mass.
3 Electric's Basic Service supply. This is consistent with the process approved by the
4 Commission in the Order. This process is also consistent with past procurements.³

5
6 Q. Could you describe the nature of the RFP that National Grid issued?

7 A. On November 5, 2010, National Grid issued an RFP to approximately twenty-five
8 potential suppliers soliciting power supplies for the period February 1, 2011 through
9 April 30, 2011. National Grid also distributed the RFP to all members of the NEPOOL
10 Markets Committee and posted the RFP on its energy supply website. As a result, the
11 RFP had wide distribution throughout the New England energy supply marketplace. The
12 RFP requested fixed pricing for each month of service on an as-delivered energy basis.
13 Prices could vary by month and by service – that is, the prices did not have to be uniform
14 across the entire service period or between Granite State and Mass. Electric. A copy of
15 the RFP is provided as Schedule MMJ-1.

16
17 Q. Are the Company's Default Service rates consistent with least cost resource planning?

18 A. Yes. While the Company has received a waiver from the Commission regarding its
19 compliance with an Integrated Least Cost Resource Plan for generation issues, the
20 Company has conducted its Default Service RFP process in a manner that is consistent

³ See e.g., Order No. 24,736 at 10 (March 26, 2007), Order No. 24,764 at 9 (June 22, 2007), Order No. 24,787 at 11 (September 21, 2007), Order No. 24,810 at 10-11 (December 17, 2007), Order No. 24,836 at 11-12 (March 21, 2008), Order No. 24,862 at 9-10 (June 20, 2008), Order No. 24,902 at 12-13 (September 29, 2008), Order No. 24,922 at 13-14 (December 19, 2008), Order No. 24,953 at 12-13 (March 23, 2009), Order No. 24,981 at 11 (June 19, 2009), Order No. 25,013 at 11-12 (September 21, 2009), Order No. 25,055 at 10-11 (December 21, 2009) Order No. 25,083 at 15 (March 22, 2010), Order No. 25,117 at 11 (June 18, 2010), and Order No. 25,150 at 11 (September

1 with least cost planning principles. The Company's proposed Default Service rates are
2 the result of a competitive bidding process used to procure the Company's power
3 obligations. This is consistent with least cost planning goals, which are to minimize costs
4 in the procurement of energy.

5
6 **IV. Results of Bidding**

7 Q. Did Granite State receive responses to the RFP?

8 A. Yes. Indicative proposals were received on December 1, 2010. Final proposals were
9 received on December 8, 2010. None of the bidders made their provision of Granite
10 State's Default Service contingent upon the provision of any other service. A summary
11 of the RFP process and bid evaluation is included in Schedule MMJ-2.

12
13 Q. How do the current futures prices for electricity and natural gas compare to the futures
14 prices at the time of the June 9, 2010 and September 15, 2010 RFPs?

15 A. The futures market prices for electricity and natural gas at the time of the June 9, 2010
16 and September 15, 2010 procurements as well as current futures market prices are shown
17 in Schedule MMJ-3.

18
19 Q. Did Granite State select any of those proposals?

20 A. Yes. Granite State evaluated the bids received and selected the supplier that (i) provided
21 a bid that was conforming to the RFP, (ii) had the lowest price, (iii) met the credit
22 requirements described in the RFP, and (iv) passed our qualitative evaluation. On

December 8, 2010, Granite State entered into a wholesale Transaction Confirmation with DTE Energy Trading, Inc. (“DTE”), the winning bidder for the Large Customer Group block, to provide Default Service to the Large Customer Group for the three-month period February 1, 2011 through April 30, 2011. Together, a Transaction Confirmation and a Master Power Agreement provide the terms for the purchase of Default Service from a supplier. A copy of the DTE Master Power Agreement was filed with the Commission on December 14, 2009 in Docket No. DE 09-010. A copy of the Transaction Confirmation between Granite State and DTE, with certain confidential sections redacted, is attached hereto as Schedule MMJ-4. Granite State is filing the Transaction Confirmation with the Commission pursuant to a Motion for Confidential Treatment. Although the Transaction Confirmation and Master Power Agreement have differences from the sample power supply agreement in the Settlement Agreement approved by the Commission, the executed documents do not shift any of the risks or obligations described in the sample power supply agreement provided in the Settlement Agreement.

V. Renewable Portfolio Standard

Q. What is the Renewable Portfolio Standard (“RPS”) obligation for 2011?

A. As specified in the RPS law⁴, the RPS obligation for calendar year 2011 is a minimum of nine and fifty-eight one hundredths percent (9.58%) of Granite State’s Default Service load, of which at least two percent (2.0%) can come from Class I New Renewable Energy Resources, at least eight hundredths percent (0.08%) can come from Class II Solar

⁴ N.H. RSA 362-F.

1 Energy Resources, at least six and one-half percent (6.5%) can come from Class III
2 Existing Renewable Energy Resources and at least one percent (1.0%) can come from
3 Class IV Existing Renewable Energy Resources.
4

5 Q. How does Granite State expect to satisfy its RPS obligations consistent with the RPS
6 rules as promulgated by the Commission?

7 A. On February 18, 2009, Granite State entered into an amended settlement agreement with
8 Commission Staff and the Office of Consumer Advocate, intended to resolve all issues
9 associated with the process by which Granite State would comply with the requirements
10 of the RPS law and the Puc 2500 rules ("Amended RPS Settlement"). The Amended RPS
11 Settlement was approved by the Commission on March 23, 2009 in Order No. 24,953.
12 As specified in the Amended RPS Settlement, Granite State requested bidders to provide
13 a separate RPS compliance adder with their bids. This RPS compliance adder is the
14 incremental charge by a bidder for agreeing to take on the RPS obligation with the
15 Default Service obligation.
16

17 Q. What were the criteria Granite State used to evaluate the RPS compliance adders
18 provided by the bidders?

19 A. Granite State evaluated the RPS compliance adders by comparing them to Granite State's
20 most recent solicitation for New Hampshire RECs. The RPS compliance adder from the
21 winning bidder for the Large Customer Group was above Granite State's market
22 estimate. As a result, Granite State did not accept the winning bidder's RPS compliance
23 adder. Granite State plans to issue an RFP in the future for the acquisition of RECs. If

1 Granite State is unable to purchase sufficient RECs to meet its NH RPS obligations, it
2 will then, consistent with the RPS rules, make an Alternative Compliance Payment
3 (“ACP”) to the Renewable Energy Fund.
4

5 Q. Is Granite State proposing any changes to the RPS compliance adder at this time?

6 A. Yes. Granite State is proposing to change the Commission-approved RPS compliance
7 adder in order to reflect the changes in estimated market costs to meet RPS obligations
8 required in the RPS regulations as described previously. The Company is proposing a
9 new RPS adder for the Large Customer Group.
10

11 Q. What is the Company proposing for changes to the RPS adders the Large Customer
12 Group?

13 A. Effective February 1, 2011, the Company is proposing to reduce the RPS adder for the
14 Large Customer Group from 0.208¢ per kWh to 0.186¢ per kWh.
15

16 Q. How did Granite State calculate the RPS adders for 2011?

17 A. As shown in Schedule MMJ-5, Granite State calculated the wholesale RPS costs on a per
18 MWh basis. The Company then converted the wholesale RPS costs to a retail cost by
19 dividing the calculated costs by ten in order to convert from a \$ per MWh wholesale cost
20 to a ¢ per kWh rate for retail use.
21

22 Q. What costs did Granite State use to develop its RPS adders?

1 A. As a proxy for actual RPS costs, the RPS adders are based on the recent Company
2 purchases of 2011 Class I, Class II, and Class IV RECs and the estimated market rate for
3 the Class III RECs.

4
5 Q. What happens if Granite State's actual RPS compliance costs are different from that used
6 in calculating the RPS adders?

7 A. Granite State will reconcile its costs to comply with the RPS with the revenue billed to
8 customers from the RPS adders. This will occur as part of the Company's annual
9 reconciliation which occurs in December of each year.

10
11 Q. Has Granite State been able to contract for RECs?

12 A. Yes. In November of this year Granite State issued a RFP to procure RECs to approved
13 New Hampshire renewable generators, generators in the process of applying for approval
14 to generate New Hampshire RECs, as well as other REC suppliers, for its 2010 and 2011
15 RPS obligations. The Company received bids for RECs and contracted for Class I, Class
16 II, and Class IV RECs for both years. The Company also contracted for 2010 Class III
17 RECs. Granite State shared the results of its RFP with Staff prior to executing a contract
18 for the purchase of RECs.

19
20 Q. When will Granite State issue the next REC RFP?

21 A. Granite State will issue a REC RFP within the next six months to procure RECs to satisfy
22 the 2010 and the 2011 RPS obligations. Granite State will attempt to procure the
23 quantity of RECs necessary to satisfy the 2010 and 2011 obligations for load that will be

1 serviced under Default Service supply contracts.

2
3 **VI. Default Service Commodity Costs and Retail Rates**

4 Q. Please summarize the commodity cost at the retail meter based on Granite State's
5 expected procurement cost used to develop the proposed retail rates.

6 A. Granite State estimates the procurement costs for Default Service at the retail customer
7 meter for each month to be as set forth in Schedule MMJ-6. The load-weighted average
8 of the commodity costs for the Large Customer Group is 7.029¢ per kWh compared to
9 the load-weighted average of 6.946¢ per kWh for the period November 2010 through
10 January 2011. The commodity costs at the retail customer meter (¢ per kWh) were
11 calculated by multiplying the commodity costs at the wholesale level (\$ per MWh) by the
12 applicable loss factor and then dividing the results by ten. The applicable loss factors can
13 be found in the RFP summary in Schedule MMJ-2.

14
15 Q. What are the Default Service rates that the Company is proposing for the Large Customer
16 Group?

17 A. As presented in Schedule MMJ-6, the Company is proposing monthly Default Service
18 rates for the Large Customer Group based on the three monthly contract prices contained
19 in the supply agreement with the winning Default Service supplier for the Large
20 Customer Group. These base rates are adjusted by the currently effective Default Service
21 Cost Reclassification Adjustment Factor to recover administrative costs associated with
22 Default Service in accordance with the Fourth Revised Page 93 of Granite State's tariff.
23 On line (3) these rates are further adjusted by the currently effective Default Service

1 Adjustment Factor in accordance with the Second Revised Page 87 of Granite State's
2 tariff. Finally, on line (4) these rates are adjusted by the proposed RPS adder discussed
3 above. As displayed on line (9), the proposed base Default Service rates for the Large
4 Customer Group are 7.400¢ per kWh, 7.449¢ per kWh, and 7.282¢ per kWh for the
5 months of February 2011 through April 2011.
6

7 Q. How will Granite State reconcile any difference in costs associated with Default Service?

8 A. To the extent that the actual cost of procuring Default Service varies from the amounts
9 billed to customers for the service, Granite State will continue to reconcile the difference
10 through a reconciliation mechanism pursuant to Granite State's Default Service
11 Adjustment Provision contained in its currently effective tariff on Second Revised Page
12 87.
13

14 Q. How and when is the Company proposing that these rate changes be implemented?

15 A. Consistent with the Commission's rules on the implementation of rate changes, the
16 Company is proposing that these Default Service rates become effective for service
17 rendered on and after February 1, 2011.
18

19 Q. Has the Company determined the impact of these proposed rate changes on customer
20 bills?

21 A. Yes. The Company has provided typical bill impacts in Schedule MMJ-7. For customers
22 in the Large Customer Group illustrative bill impacts for the three-month period ending

1 April 2011 a range of 0.8% to 0.9% as compared to the three-month period ending
2 January 2011.

3
4 Q. Has the Company prepared a revised Summary of Rates tariff page reflecting the
5 proposed rates?

6 A. No. The Company has already submitted a revised Summary of Rates tariff page
7 reflecting proposed rates for January 1, 2011 in Docket No. DE 10-307. Upon receiving
8 orders in Docket No. DE 10-307 and in this proceeding, the Company will file a revised
9 Summary of Rates tariff page, reflecting the appropriate approved rates.

10
11 Q. Has Granite State included the most recent quarterly report of migration information
12 based on monthly migration by customer class and load, as required by the Commission's
13 Order No. 24,715 in Docket No. DE 06-115?

14 A. The quarterly report of customer migration information for the third quarter of calendar
15 year 2010 is included as Schedule MMJ-8.

16
17 **VII. Tewksbury Meter Update**

18 Q. In Order No. 25,083, the Commission required the Company to keep the Commission
19 apprised of the status of the Tewksbury meter replacement. Have there been any changes
20 to the status of the replacement since the Company filed its last quarterly report with the
21 Commission on September 30, 2010?

22 A. Yes. In its September 30 report, the Company informed the Commission that it was
23 working to replace the meter and instrument transformers. Based on engineering

1 projections at that time, the project was estimated to be completed by February 2011.
2 Since that time, a more detailed engineering project plan has been established that also
3 considers ISO-NE constraints regarding when a transmission outage can be taken to
4 complete the work. The new projected completion date is November 2011, which also
5 reflects a significant change in approach and work scope, based on field investigation and
6 engineering decision making. Initially, the approach was a “reclassification” of the
7 meter. The new approach requires the replacement of the meter and instrument
8 transformation equipment in its entirety.

9
10 Q. Please explain what it means to “reclassify” a metering installation.

11 A. In cases where a metering circuit has not been providing revenue grade metering accurate
12 results, metering accuracy issues may be resolved by obtaining real time simultaneous
13 highly accurate measurements from a temporarily installed primary current or voltage
14 sensor on the designated transmission line. This type of solution, often referred to as
15 “metering circuit reclassification,” has been successful where the designated site has one
16 current transformer per phase and one voltage transformer per phase providing
17 measurements for each phase of the designated transmission circuit. Reclassification
18 software then analyzes data from the temporarily installed highly accurate current and
19 voltage transformers. This highly accurate data is compared simultaneously with the
20 existing current and voltage transformers data and establishes the appropriate ratio
21 correction factors. These correction factors are then applied real time to the existing
22 instrument transformation at the site. The reclassified measurement circuit then provides
23 revenue accurate measurement data and is used to reflect the energy reported for

1 wholesale settlement at that data point.

2
3 In this case, the Company initially believed that it could resolve the measurement issues
4 associated with the Tewksbury metering circuit through reclassification of the meter.

5 This approach is preferable, where technically applicable, because a reclassification
6 solution eliminates the need to purchase new instrument transformers and can be
7 implemented without a line outage; thereby it substantially reduces the time and
8 expenditures required for the upgrade of the measurements at any designated site.

9
10 Q. Why is meter reclassification not preferable with the Tewksbury meter?

11 A. After completing a technical site analysis and analyzing the energy measurements at the
12 Tewksbury meter, the Company determined, through engineering analysis, that the
13 existing metering and instrument transformation equipment, including the relative sizing
14 of the current transformers, is not typical when compared to other existing transmission
15 tie point installations, and that as a result, reclassification of the meter would not be
16 preferable. Reclassification was not considered the best approach for the Tewksbury
17 Substation because the existing current transformers are not sensitive enough to measure
18 the full dynamic range of current seen at this location. The preferred remediation is to
19 replace the current transformers at 800:5 with a rating factor of 4 thus allowing a
20 sensitive and revenue grade accuracy measurement over the full range of current seen at
21 this location. Based on this analysis, the Company has determined that it must replace
22 the existing transformers, capacitor voltage transformers and install a revenue grade
23 meter at Tewksbury in order to resolve the meter accuracy issues.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. What is the projected completion date for the repair based on this change in approach?

A. The Company estimates that the repair will be complete in November 2011. There is an 18 week lead time for the ordering and receipt of instrument transformation equipment and the repair also requires a transmission outage which cannot be scheduled during the summer months. The outage must ultimately be approved by the ISO-NE.

Q. Will replacement of the meter, transformers and capacitor voltage transformers resolve the meter accuracy issues?

A. Yes. The Company believes that replacement of the equipment will resolve the outstanding issues. After installation, the Company will monitor closely the meter's performance to determine whether all measurement issues have been resolved.

Q. Will the Company keep the Commission informed of the status of this project?

A. Yes. The Company will continue to provide updates to the Commission every quarter on the status of the meter replacement as well as any power cost-resettlements with ISO-NE relating to measurement or modeling problems linked to the meter.

Q. Does the Company anticipate that there will be any power cost resettlements with ISO-NE?

A. No.

VIII. Conclusion

Q. When will Granite State issue the next RFP for Default Service?

A. The Large Customer Group rates proposed in this filing end on April 30, 2011. Per the terms of the Settlement Agreement, Granite State will issue an RFP for the Large Customer Group and the Small Customer Group in February 2011. For purposes of notice to the Commission, the following table illustrates National Grid's proposed timeline for the next two RFPs:

RFP	Feb 2011 RFP	May 2011 RFP
RFP Issued	February 4, 2011	May 6, 2011
Indicative Bids Due	March 2, 2011	June 1, 2011
Final Bids Due	March 9, 2011	June 8, 2011
Contract Execution	March 10, 2011	June 9, 2011
Default Service Filing to Commission	March 15, 2011	June 14, 2011
Commission Order Needed	March 22, 2011	June 21, 2011
Service Begins	May 1, 2011	August 1, 2011

Q. Are there any proposed changes to the calendar for the February 2011 RFP that was previously submitted in this Docket?

A. Yes. Pursuant to the Settlement Agreement, the Company must make its Default Service filing no later than three business days following execution of the contract(s) with the winning bidder(s). In order to provide the staff with more time to review the filing, the Company typically makes its Default Service filing two business (2) days following execution of contract(s) with the winning bidder(s). Because of the complexity of the March filing related to the February 2011 RFP, the Company is requesting a change to the previously supplied schedule to allow it to submit the Default Service Filing to the

1 Commission on March 15, 2011 rather than March 14, 2011. To afford the staff the same
2 amount of time to review the filing, the Company is also proposing to change the
3 requested date for a Commission order from March 21, 2011 to March 22, 2011.

4

5 Q. Does this conclude your testimony?

6 A. Yes. It does.