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STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

October 26, 2021 - 9:02 a.m.

[Hearing also conducted via Webex]

RE: DG 21-131  
NORTHERN UTILITIES, INC.  
2021/2022 Cost of Gas  
(Hearing)

PRESENT: Chairwoman Dianne H. Martin, Presiding  
Commissioner Daniel C. Goldner  
  
Doreen Borden, Clerk  
Corrine Lemay, PUC Remote Hearing Host

APPEARANCES: Reptg. Northern Utilities, Inc.:  
Patrick H. Taylor, Esq.  
  
Reptg. Residential Ratepayers:  
Donald M. Kreis, Esq. Consumer Advocate  
  
Reptg. N.H. Dept. of Energy:  
Mary E. Schwarzer, Esq.

Court Reporter: Susan J. Robidas, NH LCR No. 44

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I N D E X

WITNESS PANEL:            FRANCIS X. WELLS  
                                 CHRISTOPHER A. KAHL  
                                 S. ELENA DEMERIS

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| 1 | 2021/2022 Annual Cost of Gas Adjustment Filing   | Premarked |
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| 3 | Corrected Red-lined Tariff Revised Pages 43 and 85   | Premarked |
| 4 | Supplemental Testimony of Francis X. Wells with attachments  | Premarked |
| 5 | Response to Commission 10/2/21 Record Request  | Premarked |
| 6 | Excerpts from Northern's Responses to Energy's Technical Session Data Requests, including TS1-1 through TS 1-5 (excluding attachments to TS 1-5) | Premarked |

1 P R O C E E D I N G S

2 CHAIRWOMAN MARTIN: We're here this  
3 morning in Docket DG 21-131 for a hearing  
4 regarding the Northern Utilities,  
5 Incorporated 2021 to 2022 Cost of Gas filing.

6 Let's start by taking appearances  
7 with Mr. Taylor.

8 MR. TAYLOR: Good morning. Patrick  
9 Taylor on behalf of Northern Utilities, Inc.

10 CHAIRWOMAN MARTIN: Thank you.

11 And Mr. Kreis.

12 MR. KREIS: Good morning. I'm  
13 Donald Kreis, the consumer advocate, here on  
14 behalf of residential utility customers, all  
15 by myself this morning.

16 CHAIRWOMAN MARTIN: All right.

17 And Ms. Schwarzer. You're on mute.

18 MS. SCHWARZER: Good morning. Mary  
19 Schwarzer, here for the Department of Energy.

20 CHAIRWOMAN MARTIN: Okay. And for  
21 exhibits, I have Exhibits 1 through 6  
22 prefiled and premarked. Are there any  
23 changes?

24 MR. TAYLOR: No. We'll make a

1 correction on the stand, but no changes to  
2 the exhibits.

3 CHAIRWOMAN MARTIN: Okay. Anybody  
4 else on exhibits?

5 [No verbal response]

6 CHAIRWOMAN MARTIN: All right.  
7 Anything else we need to do for preliminary  
8 matters?

9 MR. TAYLOR: Not from the Company's  
10 standpoint.

11 CHAIRWOMAN MARTIN: And I don't see  
12 any other hands, so let's move to the  
13 witnesses. Could you identify the witnesses  
14 before we have them sworn in, please.

15 MR. TAYLOR: Yes. This morning I  
16 have with me Francis Kahl -- Francis Wells,  
17 Christopher Kahl and Elena Demeris.  
18 Mr. Wells is to my immediate right, Mr. Kahl  
19 is two people down, and Ms. Demeris is  
20 dialing in remotely today.

21 CHAIRWOMAN MARTIN: All right.  
22 Thank you.

23 Ms. Robidas, would you swear in the  
24 witnesses, please.

1 (WHEREUPON, FRANCIS X. WELLS,  
2 CHRISTOPHER A. KAHL AND S. ELENA  
3 DEMERIS were duly sworn and cautioned  
4 by the Court Reporter.)  
5 FRANCIS X. WELLS, SWORN  
6 CHRISTOPHER A. KAHL, SWORN  
7 S.ELENA DEMERIS, SWORN

8 CHAIRWOMAN MARTIN: Let's go off  
9 the record.

10 (Pause in proceedings)

11 CHAIRWOMAN MARTIN: Back on the  
12 record. Mr. Taylor.

13 MR. TAYLOR: Thank you,  
14 Commissioners. I'm going to take the  
15 order -- take the witnesses in the following  
16 order, starting with Mr. Kahl, Ms. Demeris  
17 and then --

18 MS. SCHWARZER: I apologize. Were  
19 the witnesses sworn in? Because I didn't  
20 hear it.

21 MR. TAYLOR: Yes.

22 CHAIRWOMAN MARTIN: They were.

23 MS. SCHWARZER: Okay.

24 MR. TAYLOR: The order of witnesses

1 for the Company this morning will be Mr.  
2 Kahl, Ms. Demeris, and then Mr. Wells. So  
3 I'll start with Mr. Kahl.

4 DIRECT EXAMINATION

5 BY MR. TAYLOR:

6 Q. Please give your name and position with the  
7 Company.

8 A. (Kahl) Christopher Kahl.

9 CHAIRWOMAN MARTIN: Mr. Kahl, you  
10 need to turn on the microphone and speak very  
11 closely into it.

12 A. (Kahl) Christopher Kahl, senior regulatory  
13 analyst with Unitil Service Corp.

14 Q. Thank you. And have you previously testified  
15 before the Commission?

16 A. (Kahl) Yes, I have.

17 Q. Mr. Kahl, the Company's marked a series of  
18 exhibits. Hearing Exhibit 1 is a redacted  
19 version of the Company's initial filing, and  
20 Hearing Exhibit 2 is the confidential  
21 version. I'm going to ask that you just  
22 refer to Exhibit 2, starting at Bates  
23 Page 34. Was this testimony prepared by you  
24 or under your direction?

1 A. (Kahl) Yes, it was.

2 Q. And were the schedules that accompany your  
3 testimony prepared by you or under your  
4 direction?

5 A. (Kahl) Yes.

6 Q. Do you have any changes or corrections to  
7 your testimony or the accompanying schedules  
8 you'd like to note on the record?

9 A. (Kahl) No.

10 Q. With respect to your testimony, if you were  
11 asked the same questions in that testimony  
12 today, would your answers be the same?

13 A. (Kahl) Yes.

14 Q. Thank you.

15 Ms. Demeris, if you could please refer  
16 to the same exhibit, beginning at Page 90.  
17 Was this testimony prepared by you or under  
18 your direction?

19 A. (Demeris) Yes.

20 Q. And were the schedules that accompanied your  
21 testimony prepared by you or under your  
22 direction?

23 A. (Demeris) Yes, they were.

24 Q. Do you have any changes or corrections to



1           your testimony or the accompanying schedules  
2           that you'd like to note on the record?

3    A.    (Demeris) No, I do not.

4    Q.    And with respect to your testimony, if you  
5           were asked the same questions today, would  
6           the answers be the same?

7    A.    (Demeris) Yes.

8    Q.    I'm also going to ask you to refer to Hearing  
9           Exhibit 6, which was entered by the Staff.  
10           It's a compilation of technical session  
11           request responses that were submitted in this  
12           docket. And I'd ask you to go to Page 23.  
13           Are you there?

14   A.    (Demeris) Yes, I have it.

15   Q.    Okay. Thanks. This is the Company's  
16           response to Technical Session Request 1-2;  
17           correct?

18   A.    (Demeris) 1-3.

19   Q.    1-3. My apologies. Thank you.

20                   And was this response prepared by you or  
21           under your direction?

22   A.    (Demeris) Yes, it was.

23   Q.    And are there any changes or corrections that  
24           you'd like to make regarding this response?

1 A. (Demeris) Yes. The last sentence of the  
2 first paragraph should read, "Northern is  
3 proposing year one of decoupling period  
4 August 1, 2022 to July 31, 2023, with the  
5 first revenue decoupling adjustment factor to  
6 be included as part of the LDAC, effective  
7 November 1, 2023," not 2024.

8 Q. Thank you.

9 A. (Demeris) Thank you.

10 Q. Mr. Wells, if you could reference Hearing  
11 Exhibit 2, Page 66. Was the testimony  
12 beginning with this page prepared by you or  
13 under your direction?

14 A. (Wells) Yes.

15 Q. And were the schedules that accompanied your  
16 testimony prepared by you or under your  
17 direction?

18 A. (Wells) Yes.

19 Q. And do you have any changes or corrections to  
20 this testimony or the accompanying schedules  
21 that you'd like to note on the record?

22 A. (Wells) I do not.

23 Q. And with respect to your testimony, if you  
24 were asked the same questions today, would

1 your answers be the same?

2 A. (Wells) Yes.

3 Q. I'm also going to ask that you refer to  
4 Hearing Exhibit 4, which is a supplemental  
5 filing that the Company made during  
6 mid-period of this case.

7 A. (Wells) I'm there.

8 Q. Was this supplemental testimony prepared by  
9 you or under your direction?

10 A. (Wells) Yes.

11 Q. Were the schedules that accompanied the  
12 supplemental testimony prepared by you or  
13 under your direction?

14 A. (Wells) They were.

15 Q. Can you please summarize for the Commission  
16 your reason for filing this supplemental  
17 testimony?

18 A. (Wells) I can. The primary reason for filing  
19 the supplemental testimony was to notify the  
20 Commission and the other parties of a change  
21 in the Company's procurement process for the  
22 2021-2022 winter period. Specifically, the  
23 Company had locked in the NYMEX portion of  
24 the supply contracts for several of its

1 contracts, as detailed in my supplemental  
2 testimony. This is a change from prior  
3 practice, as those supply contracts would  
4 normally be allowed to go to the final  
5 settlement of NYMEX relative to our supply  
6 contracts.

7 We took this action because we saw what  
8 we believed to be increased volatility and  
9 high prices for NYMEX in the market and  
10 determined that in the best interest of  
11 preventing, you know, the need to go in for a  
12 substantial increase in the cost of gas  
13 during the winter would be to lock in a  
14 portion of those NYMEX prices to prevent the  
15 volatility from affecting consumers during  
16 the winter period.

17 Secondly, we also filed an update to  
18 the conversion surcharge that is applicable  
19 to customers that are capacity-exempt that  
20 may be considering returning to sales  
21 service. The conversion surcharge is  
22 intended because capacity-exempt customers  
23 are not planned for by the Company. We would  
24 plan to purchase gas in order to serve them.



1 discussing the reasons for increases in cost  
2 of gas rates. And he says the increase is  
3 due to a significant increase in commodity  
4 costs. And of course we just heard about  
5 even further increases more recently. And  
6 then he says the impact of higher commodity  
7 cost is partially offset by an increase in  
8 projected sales and a smaller reconciliation  
9 under-collection compared to the prior year.

10 I don't really care which of the  
11 witnesses answer this question, but I'd like  
12 to hear more about why the Company sees an  
13 increase in its projected sales during the  
14 period covered by this proceeding.

15 A. (Wells) The increase in projected sales  
16 relative to the 2021 -- or excuse me -- the  
17 2020-2021 annual period is due to a recovery  
18 in the economic activity related to, you  
19 know, the economic impacts of the COVID-19  
20 pandemic. The forecast for 2021-2022 -- I  
21 apologize, I've tongue-tied myself --  
22 reflects more of a use per customer, more  
23 historic use per customer figures than were  
24 used for the 2020-2021 period, where, you

1 know, we were in the throes of the economic  
2 impacts of the COVID 19 crisis.

3 And so the primary reason for the  
4 reduced -- or excuse me -- the increased  
5 projected sales is sort of more of a return  
6 to, I don't want to say "business as usual,"  
7 but a more normal, in a historic sense, sales  
8 on use per customer basis for the Company.

9 Q. Do those increases primarily concentrate in  
10 the commercial and industrial sector, or do  
11 you see increases for residential customers  
12 as well?

13 A. (Wells) The best place to get that  
14 information would be FXW-1, which I don't  
15 have a -- I apparently refer to FXW-1 several  
16 times in my testimony.

17 CHAIRWOMAN MARTIN: Mr. Taylor, do  
18 you have a Bates page for that?

19 MR. TAYLOR: I am getting there.

20 A. (Kahl) 174.

21 A. (Wells) Thank you.

22 BY MR. KREIS:

23 Q. 174 you said?

24 A. (Wells) Yes. So beginning on 174, this is

1 the sales forecast for the Company compared  
2 to prior periods. And on Page 2 I show  
3 residential non-heat meters. And that will,  
4 of course, show a modest decline, as it  
5 typically does, mostly reflective of those  
6 customers converting to residential heat,  
7 which would be the largest of the residential  
8 classes.

9 We are showing a winter period increase  
10 in residential sales of approximately  
11 5.9 percent. And for commercial, we are  
12 seeing an increase of approximately  
13 6.5 percent relative to the 2020-2021 winter  
14 period on a weather-normalized basis.

15 Q. And you attributed, I thought I heard you  
16 say, all of those increases to what you  
17 expect to be an economic recovery from the  
18 depths of the pandemic, if I might paraphrase  
19 what you just testified. Is that a fair  
20 paraphrase of your --

21 A. (Wells) That is fair.

22 Q. Are you worried at all that that recovery  
23 might not occur as you have predicted?

24 A. (Wells) I mean, it certainly is a



1 possibility. But it's not something that is  
2 a... I mean, of course it is a forecast. And  
3 so we, of course, expect there to be variance  
4 to that forecast for a number of reasons,  
5 including economic factors. Typically  
6 weather is a bigger driver of variance in the  
7 forecast than any other single variable.  
8 But, you know, I would certainly concede  
9 that, you know, the economy can and would  
10 continue -- if the economic projections that  
11 the Company relied upon for forecasts are  
12 incorrect, it would certainly cause variance.  
13 We would expect it to cause variance in our  
14 forecast.

15 Q. Do demand forecasts take into account any  
16 demand elasticity that might arise out of  
17 rate increases?

18 A. (Wells) Not to my knowledge.

19 Q. And that would be because you don't think  
20 that demand is terribly elastic. If you  
21 raise your prices, your customers are still  
22 going to take the service. Fair statement?

23 A. (Wells) I would have to defer an answer to  
24 that response. I didn't -- while I am -- you

1 know, I didn't personally prepare the  
2 forecast myself. It would be, you know,  
3 speculative for me to say that, you know, we  
4 don't believe there to be elasticity. But I  
5 would definitely say that, you know, in my  
6 personal opinion, that, you know, the  
7 price -- in my experience when we've used  
8 price modeling, when we've tried to model  
9 price in long-term IRPs, it tends not to be a  
10 particularly significant variable in our  
11 model and ultimately ends up being dropped  
12 from the final model.

13 So I think, you know, based on my  
14 understanding and experience, I would say  
15 that that is correct; the demand for energy  
16 supply is not terribly elastic relative to  
17 price.

18 Q. Sure. And Mr. Wells, I apologize for trying  
19 to get you to pretend to be an economist.  
20 And I'm not trying to trip anybody up. I  
21 think this filing is very thorough and very  
22 persuasive.

23 At Page 79 of Exhibit 2, which is  
24 Mr. Wells's testimony, he's talking about the

1           Weymouth compressor station down in  
2           Massachusetts, and he's referring to a FERC  
3           proceeding which appears to be a  
4           re-examination of the propriety of putting  
5           that station into operation. And then on  
6           Page 79, at Lines 12 through 15, he says  
7           Northern's supply plan and corresponding  
8           estimated cost of gas supply assumes  
9           continued operation of the Weymouth  
10          compressor station, which is necessary to  
11          shift supplies from the Algonquin system into  
12          the Maritime system for ultimate delivery to  
13          Northern.

14                   Does Northern see a significant threat  
15                   that the Weymouth compressor station might  
16                   not be allowed to continue to operate?

17    A.   (Wells) I really have to admit I really don't  
18           know what the likelihood is that that  
19           regulatory proceeding results ultimately in  
20           some modification or, you know, premature  
21           ending of the operation of the Weymouth  
22           compression station. To be candid, I would  
23           say the bigger risk relative to the Weymouth  
24           compressor station is its operational

1 capabilities.

2 The operational history of it has been  
3 very relatively unreliable to other similar  
4 compressor stations that, you know, the  
5 Company has relied on for incremental supply  
6 in the last, you know, four or five years.  
7 So to me, that is the bigger and the more  
8 immediate risk in the regulatory proceeding.  
9 That regulatory proceeding, at least insofar  
10 as this upcoming winter is concerned, is  
11 really tied up in the courts. You know,  
12 there are legal challenges to whether the  
13 FERC has the authority to, once a certificate  
14 is issued and once authorization to place  
15 those facilities that have been certificated  
16 into service, whether the FERC has even the  
17 authorization to re-examine those decisions.  
18 And not being, you know, a lawyer, I would  
19 be -- I wouldn't want to put any, you know,  
20 odds on what the likelihood is of any  
21 particular result. But in my personal  
22 opinion, it seems as though, having reviewed  
23 some of the briefs, it would seem as though  
24 it is -- I would say it's relatively unlikely

1           that those proceedings ultimately end in some  
2           modification of the Weymouth compression  
3           station. But that having been said, you  
4           know, it is certainly on the Company's mind.  
5           But as I said previously, our biggest concern  
6           or more immediate concern is a forced outage  
7           that it has regrettably experienced several  
8           of in its short history.

9    Q.    Having now cast you in the role of an  
10   economist and a FERC lawyer, I guess I'll try  
11   to stick to what I understand to be your real  
12   expertise.

13                I was intrigued by the reference you  
14   just made to the forced outages at Weymouth  
15   station. Do you have a theory or opinion  
16   about why that particular facility has been  
17   less reliable than you would have expected  
18   ordinarily?

19   A.    (Wells) For me to offer -- go ahead.

20                (Discussion off the record between  
21   counsel and witness.)

22                MS. SCHWARZER: Excuse me. I can  
23   no longer hear the testimony.

24                WITNESS WELLS: That's okay because

1 I haven't been testifying.

2 MR. KREIS: Mr. Taylor was just  
3 conferring with his witness, presumably off  
4 the record.

5 A. (Wells) As to the reason, I can tell you that  
6 there are -- there was initially a FMSA  
7 corrective action order and, you know, a  
8 report filed by a consultant which had hired  
9 DMV. And they recommended several changes to  
10 their operation that would presumably address  
11 the kinds of spotty -- you know, the forced  
12 outages of the Weymouth compression station  
13 going forward. Regrettably, even after  
14 filing that report, there were further  
15 outages. You know, the good news is that,  
16 you know, since it last returned to service  
17 during June, the operational history has been  
18 better. But, you know, we don't really have  
19 that long of a operational history to be able  
20 to project what will happen, you know, when  
21 we're really counting on that facility in the  
22 winter.

23 Q. Can you give me a feel for how important the  
24 Weymouth compression station is to the

1           successful management of Northern's supply  
2           portfolio?

3       A.     (Wells) So out of our portfolio of  
4           approximately 140,000 decatherms, Atlantic  
5           Bridge comprises 7,500. So it is also --  
6           that's not to say that it is relatively  
7           unimportant. It is a critical supply option  
8           for us at the Lewiston Gate station. So that  
9           is one of the -- you know, we do have  
10          alternate supplies that we can rely on on a  
11          short-term basis. Should that become  
12          unavailable, we can also re-purpose the  
13          Maritimes capacity. You know, presumably,  
14          even if Weymouth compression station were to  
15          be unavailable, we would still have the  
16          Maritimes capacity to be able to move other  
17          supplies to that supply area.

18                 So I would say that it is, you know, it  
19                 is a significant portion of our supply and  
20                 that we would obviously, you know, need to  
21                 make some adjustments if that were to prove  
22                 to be unavailable for any extended period of  
23                 time.

24       Q.     Thank you. Moving ahead to Page 94 of

1 Exhibit 2, now I'm into Ms. Demeris's  
2 testimony. At Page 94 she is talking about a  
3 decrease in the energy efficiency component  
4 of the LDAC, and she testifies that the  
5 Company is actually proposing to decrease the  
6 energy efficiency charge from \$0.774 to  
7 \$0.449 per therm. And she notes that the  
8 Commission instructed all the energy  
9 efficiency utilities to maintain their 2020  
10 program. But I just want to make sure I'm  
11 understanding why the charge is decreasing.

12 Do I have this right? Last year's  
13 filing assumed that the Triennial Plan that's  
14 still pending in front of the Commission  
15 would be implemented. So you increase the  
16 energy deficiency charge, and now you're  
17 decreasing it to sort of back out of the  
18 Triennial Plan and into a universe where the  
19 2020 budgets are the ones that are governing  
20 the energy efficiency programs? Am I  
21 understanding you correctly?

22 A. (Demeris) Yeah, that's exactly correct, Don.

23 Q. Thank you.

24 Then I think this might relate to the



1 correction that you provided earlier. I  
2 didn't quite understand why the lost revenue  
3 recovery charge is drastically disappearing  
4 because of the timing of the decoupling  
5 mechanism that Northern has proposed in its  
6 rate case. First of all, that assumes  
7 approval of the decoupling mechanism; does it  
8 not?

9 A. (Demeris) Well, the reduction in the savings  
10 reflects removal of lost revenue to the  
11 temporary rates that were approved for effect  
12 on October 1 of 2021. So the savings in the  
13 lost revenue calculation had to be reduced --

14 Q. Because of the --

15 A. -- which is --

16 [Court Reporter interrupts.]

17 A. (Demeris) So that you wouldn't be double  
18 recovering because you're already recovering  
19 lost revenue in temporary rates.

20 Q. Thank you. That's the part I didn't  
21 understand. Thank you for clarifying.

22 A. (Demeris) Yup.

23 Q. And then, so at Page 100, Ms. Demeris is  
24 talking about the effects of all of this on a

1 typical residential heating customer. And  
2 during the winter period, the Company expects  
3 an increase of about \$93, or a 9.1 percent  
4 increase compared to last year.

5 And then looking ahead to the summer,  
6 the Company, if I'm understanding correctly,  
7 actually expects a typical residential  
8 heating customer to experience a bill  
9 decrease in the coming summer season. What's  
10 the reason for the bill decrease?

11 A. (Demeris) So I wanted to look at the bill  
12 impact schedules. That would be Bates 315  
13 through 324, I believe. And then in the  
14 summer we're going to have projected -- we'll  
15 have projected summer rates. What ends up  
16 happening is that the decrease in the LDAC is  
17 greater than the decrease in the cost of gas.  
18 It is greater than the increase in the cost  
19 of gas, which results in an overall decrease.

20 Q. Thank you. I'm sorry that I went to law  
21 school and not business school because I  
22 would have been able to figure that out  
23 myself had I gone to business school and not  
24 law school. But I didn't have time to do

1 both.

2 MR. KREIS: I think those are all  
3 my questions I have for these witnesses. And  
4 I do want to thank the Company for a very  
5 thorough and persuasive presentation in  
6 writing.

7 CHAIRWOMAN MARTIN: All right.  
8 Thank you.

9 Ms. Schwarzer.

10 CROSS-EXAMINATION

11 BY MS. SCHWARZER:

12 Q. Thank you. Took me a minute to unmute. I  
13 wanted to initially just acknowledge, as did  
14 the OCA, this well-organized and clear  
15 petition. In particular, it did seem to me  
16 unusual to find a table of contents after the  
17 schedules at Exhibit 2, Page 32, but  
18 wonderful to have one. And then in Exhibit 6  
19 you very kindly created a table of schedules  
20 to match the prior years' schedules,  
21 including Bates page numbers where the new  
22 schedule titles can be found, at Bates Page  
23 26 of Exhibit 6. So thank you very much for  
24 that.

1           Just to start with some very basic  
2 information which has been touched on, Ms.  
3 Demeris, you talked about the bill impacts.  
4 Could the panel just state what the requested  
5 cost of gas rates are on the record for the  
6 upcoming periods.

7   A.   (Kahl) Mary, this is Chris Kahl. Let me  
8 handle -- the cost of gas rates, is that what  
9 you're asking about?

10   Q.   Yes, just on the record what they are for the  
11 upcoming winter and summer.

12   A.   (Kahl) Okay. For the winter period, the  
13 proposed cost of gas rate for residential  
14 customers is 93.92 cents. For high load  
15 factor, commercial and industrial customers,  
16 the proposed rate is 84.53 cents. And for  
17 low load factor, commercial and industrial  
18 customers, it's 95.51 cents. And that is for  
19 the winter period.

20           For the summer period, the proposed rate  
21 for residential customers is 51.76 cents.  
22 For high load factor, commercial and  
23 industrial customers, it's 47.4 cents. And  
24 for low load factor, commercial and

1 industrial customers, it's 54.45 cents.

2 Q. And do you know which Bates page in your  
3 testimony that information appears?

4 A. (Kahl) In the filing --

5 Q. Sorry. Yes, in the filing.

6 A. (Kahl) -- the tariff pages are provided on  
7 Bates Page 10 and 11.

8 Q. Is there a narrative portion of your  
9 testimony that also makes those statements?

10 A. (Kahl) I believe there is. Let me find the  
11 page. Yes. Those are on Bates Pages 38 and  
12 39.

13 Q. And how do those new proposed cost of gas  
14 rates compare as a percentage of last  
15 period's rates?

16 A. (Kahl) The winter rates are significantly  
17 higher than last year. And it's mentioned in  
18 my testimony, and I believe in Mr. Wells's  
19 testimony, that it's due to a large degree on  
20 higher commodity costs.

21 Q. Do you have a -- is it fair to say the  
22 increase is between 30 and 40 percent as  
23 compared to last year?

24 A. (Kahl) We have increases from about the 28 to

1 30 percent range compared to the prior year.

2 For the summer --

3 Q. Excuse me.

4 A. (Kahl) For the summer, we're looking at  
5 increases of about 3 to about 5-1/2 percent  
6 compared to the prior year.

7 Q. And can you share, just at a very high level,  
8 what factors you believe contribute to the  
9 higher commodity factors, as a panel?

10 A. (Wells) As Mr. Kahl had just testified, the  
11 primary reason for the increased cost of gas  
12 is due to supply costs, which is driven by  
13 NYMEX. NYMEX supply costs have been pulled  
14 up in recent months by a number of factors.  
15 These include lower -- or excuse me -- higher  
16 demands relative to prior years, lower  
17 storage inventory levels relative to the  
18 five-year average, higher LNG exports, and  
19 the anticipation of increased LNG export  
20 capacity to serve global markets. And so  
21 these are the primary reasons for the  
22 increase in commodity costs that have been  
23 observed.

24 Q. Do you believe that weather, including but

1 not limited to, hurricane in the southern  
2 part of the country contributed at all to the  
3 commodity increases?

4 A. (Wells) I would say that it definitely was a  
5 factor. You know, it is part of, though, an  
6 overall lower increase in production that has  
7 been observed and is contributing to the  
8 lower storage inventory levels that are  
9 usually a harbinger of what price action  
10 there will be in the upcoming winter.

11 Q. Do you believe that lower production is  
12 connected in any way to the recent 18-month  
13 COVID events?

14 A. (Wells) It would be speculative for me to say  
15 for certain, but it's certainly -- I'm sure  
16 that, you know, the impact on the capital  
17 markets of COVID-19 and other, you know,  
18 economic headwinds I'm sure have affected the  
19 exploring and production companies that would  
20 normally be producing this supply. You know,  
21 and it probably required more financial  
22 discipline. And access to capital markets  
23 I'm sure affects production. Based on my  
24 review of EIA's short-term outlook, it seems

1 as though they at least believe that  
2 production will gradually increase during  
3 2021 and 2022 to there being a better match  
4 between supply and demand in North America,  
5 or in the U.S. in particular with EIA.

6 Q. You had mentioned a reference to the NYMEX  
7 rates. Noting that Northern filed its  
8 petition on September 17th and is comfortable  
9 to date with all -- with a vast majority of  
10 figures that were filed -- and you haven't  
11 filed an updated petition in the last week,  
12 for example -- could you share when Northern  
13 checked the NYMEX rate before it made its  
14 initial filing? And I'll ask a follow-up  
15 question to that.

16 A. (Wells) So the NYMEX prices that we used for  
17 the filing were dated September -- for the  
18 settlement were as of September 14, 2021.

19 Q. And has the Company looked back to NYMEX  
20 rating to look at trends or to update those  
21 numbers?

22 A. (Wells) I look at the NYMEX prices every day,  
23 including this morning, but --

24 Q. Can you share what you've observed from



1           September 14th to the present with regard to  
2           a trend and what the NYMEX rate was today?

3    A.   (Wells) Well, you know, we specifically,  
4           prior to the supplemental filing, you know,  
5           reviewed what the NYMEX prices would be as of  
6           that date and whether or not, in light of the  
7           prices that we had locked in, that I  
8           testified to in the supplemental filing, as  
9           well as the prices for NYMEX that would be  
10          applicable to the non-hedged portion of our  
11          portfolio, we did that as of September 30th  
12          and determined that the impact was not  
13          sufficient to warrant a change in the  
14          Company's proposal.

15   Q.   And when you were assessing what sort of  
16          change would -- whether or not a change was  
17          necessary to -- whether the current proposal  
18          was sufficient, given the NYMEX rates that  
19          you looked at to date, were you including in  
20          your analysis a 25 percent cap on any  
21          increase in rates?

22   A.   (Kahl) Yes, Mary, we always keep that in mind  
23          because obviously if the prices are going to  
24          be going up, or if we suspect or fear that

1 prices may increase, you know, we keep in  
2 mind what that cap is. So we are kind of  
3 looking at, well, is this something that's  
4 really going to bump up against that or  
5 exceed that 25 percent cap. You know, that  
6 cap is designed to help avoid additional  
7 filings and the amount of work. And we think  
8 that based on how the portfolio's structured  
9 this year, that we will be able to stay under  
10 that cap.

11 Q. And is that -- fair to say that's true to say  
12 for both the winter and summer period?

13 A. (Wells) I would just want to add that part of  
14 the reason that we did the hedging that I  
15 discussed in my supplemental testimony was to  
16 avoid or reduce the probability that the  
17 Company would be needing to come in, you  
18 know, because we had exceeded -- you know,  
19 because we were outside of the 25 percent  
20 cap. You know, the Company does understand  
21 the impact that large increases in cost of  
22 gas have on the communities that we serve and  
23 seek to take, you know, necessary and  
24 reasonable steps to avoid imposing those

1 types of unexpected increases in costs.

2 But, you know, relative to the summer  
3 period, you know, there's a lot of time  
4 between now and when the summer period  
5 occurs. And so it would be speculative for  
6 us to say that we -- you know, to know  
7 whether or not that 25 percent cap is, you  
8 know, going to be hit prior to the May  
9 through October rate taking effect. That  
10 having been said --

11 Q. Of course.

12 A. (Wells) -- you know, we have been looking  
13 at -- I would say that the sensitivity to  
14 market conditions is higher on the November  
15 through March period than it is on the April  
16 through October period. Just that those  
17 prices are more volatile and more likely if  
18 there is to be a price spike, that it would  
19 be relative to those winter period months  
20 rather than the summer. But, you know, one  
21 thing that has been, you know, true since  
22 I've been involved in the energy market for  
23 the past 20 years is that you never know what  
24 is going to happen or change that could

1 impact rates down the road. And so we've  
2 built a portfolio with 70 percent locked in  
3 for the winter period. There's nothing  
4 locked in for the summer period. And that  
5 is, you know -- and so that's going to lead  
6 to more variability in the summer rate as the  
7 NYMEX prices go up and down.

8 Q. Thank you for your thoughtful answer. I  
9 didn't mean to suggest you could guarantee  
10 any particular rate.

11 And you may have answered this already.  
12 With regard to the supplemental filing where  
13 you've now locked in an estimated  
14 approximately 70 percent, how does that  
15 70 percent locked in compare to average  
16 winters? How much more?

17 A. (Wells) I would say typically our locked-in  
18 pricing would be only the storage, which is  
19 usually around closer to 40 percent of the  
20 total than to 70. So it was a significant  
21 move to increase the amount of pipeline  
22 supplies that we had locked in the NYMEX  
23 portion.

24 Q. And you may have answered this, too. But in

1 terms of the NYMEX rate this morning, did you  
2 find it significantly changed from the rate  
3 that you used on September 14th?

4 A. (Wells) As of right now, you know, our  
5 observation, we noticed that yesterday prices  
6 were up for the November contract 60 cents a  
7 decatherm. And actually, it settled over six  
8 dollars, which is significant relative to  
9 September 14th. Prices that we observed --  
10 and this is one of the challenges when you're  
11 in a volatile market. These NYMEX updates in  
12 most years are, you know, so small that, you  
13 know, that we have a better idea of where  
14 things are. And it was, you know, up 60  
15 cents yesterday; when I looked at it today  
16 just before the hearing, it was down 15  
17 cents. So --

18 Q. It was down?

19 A. (Wells) Yeah. So obviously we will continue  
20 so look at the NYMEX pricing, and all of the  
21 pricing for that matter, relative to the  
22 winter cost of gas period because we know  
23 it's really important that if we see that  
24 there is a -- you know, right now it's one

1 day. And if it ends up being more sustained  
2 price action, we will definitely alert the  
3 parties and take whatever steps we deem are  
4 necessary relative to the rates.

5 Q. And certainly with the current cost of gas  
6 mechanism, through monthly trigger filings  
7 you can increase the rates effective the  
8 first of each month; correct?

9 A. (Kahl) That's correct.

10 Q. I had a question about the LDAC calculated in  
11 the current cost of gas. It is lower than  
12 last year's LDAC; is that correct?

13 A. (Demeris) Yes, that is correct.

14 Q. And can you speak to why that is in a bit  
15 more detail? I think you touched on it  
16 before.

17 A. (Demeris) Yeah. So the LDAC is made up of  
18 several rate components. And then in this  
19 current filing, the GAPRA increased, the EEC  
20 decreased, the lost revenue  
21 rates --[connectivity issue]

22 [Court Reporter interrupts.]

23 CHAIRWOMAN MARTIN: Let's go off  
24 the record for a second until she gets a good

1 connection.

2 (Pause in proceedings.)

3 CHAIRWOMAN MARTIN: Back on the  
4 record. And if you could restate, starting  
5 with the components and the increase and  
6 decrease. I think that's where we lost you.

7 A. (Demeris) Okay. So I think if we look at  
8 Bates Page 24, that's the red-lined --

9 BY MS. SCHWARZER:

10 Q. Exhibit 2?

11 A. (Demeris) Yes. Exhibit 2, Bates Page 24 is  
12 the red-lined LDAC. And that shows how the  
13 rates have increased and decreased, and then  
14 the total decrease is in the last column.

15 So --

16 Q. Let me just get caught up with you. I'm  
17 sorry. I'm not there.

18 A. (Demeris) Okay. Oh, I'm sorry.

19 Q. No, that's okay. Just a lot of paper. Okay.  
20 Bates Page 24, Exhibit 2. I'm with you.  
21 Thank you.

22 A. (Demeris) So if we just look at the top line  
23 for residential heating, we see that the  
24 GAPRA has increased from .0044 to .006. But

1 the EEC in the next two columns decreased  
2 from .0774 to .0449; lost revenue rate  
3 decreased to .0066. The ERC also decreased.  
4 So the end result when we add all the new  
5 charges up is a decrease from the prior  
6 period.

7 Q. Does the Company have a parallel proceeding  
8 which might lead to an increase in the LDAC  
9 if the request for relief is granted, to your  
10 understanding?

11 A. (Demeris) It does, but that proceeding will  
12 not be resolved until February of 2022. So  
13 that mechanism will not show up in the LDAC  
14 until November 1 of 2022. So that --

15 Q. I'm sorry. Go ahead.

16 A. (Demeris) So it's not going to have any  
17 effect on this November 1, 2021 rate.

18 Q. So am I understanding correctly that for the  
19 duration of this cost of gas year, the  
20 Company does not expect to implement an  
21 increased LDAC based on the other docket?

22 A. (Demeris) That is correct.

23 Q. With regard to Northern's plans to implement  
24 decoupling, which I understand are tentative



1 at this time and not fully approved, Northern  
2 anticipates implementing decoupling effective  
3 August of 2022; is that correct? And perhaps  
4 that is the page you corrected earlier?

5 A. (Demeris) Yes. The dates are shown on, I  
6 believe it's Exhibit 6. I'm not sure of the  
7 Bates page.

8 Q. It's Page 23.

9 A. (Demeris) Yeah.

10 Q. So the first decoupling period is August 1 of  
11 2022. Are there any schedules or figures or  
12 costs associated with decoupling that appear  
13 in the present filing?

14 A. (Demeris) No, there are not. But as I  
15 explained to Don earlier, we do see some  
16 reduction in lost revenue associated with the  
17 decoupling proposal.

18 Q. Yes. Thank you. I've got that. That  
19 explanation was very helpful to me as well.

20 A. (Demeris) Great. Thanks.

21 Q. Just to confirm the obvious, Northern does  
22 not have a fixed price option for cost of gas  
23 proceedings; is that correct?

24 A. (Kahl) That is correct.

1 Q. All right. And could -- [connectivity issue]  
2 [Court Reporter interrupts.]

3 Q. Could the panel comment on the bad debt  
4 percentages anticipated this year as compared  
5 to last year?

6 A. (Kahl) Mary, can you just indicate what you  
7 are referencing with that question? Are you  
8 looking at a particular page of the filing?

9 Q. No, I have not identified a particular page  
10 of the filing. I just wonder what the answer  
11 is in terms of what Northern has anticipated  
12 for bad debt this year as opposed to bad debt  
13 last year. It may be in there --

14 A. (Kahl) Yes, hold on one minute.

15 Q. Sure. Please take your time.

16 (Pause)

17 A. (Kahl) Yes. On Bates Page 155, I have a  
18 table on the calculation of bad debt. And we  
19 do get a projection from basically our  
20 billing department on what to expect. And  
21 our projection is about 400,000 for -- and  
22 our projections are based on a calendar year,  
23 so it's 2022. And that amount did come down  
24 from last year. I don't have the exact

1           number from last year, but it was somewhere  
2           between 450 and maybe 475.

3    Q.    And my last question is maybe something you  
4           could help me understand. I know Northern  
5           made a filing, Exhibit 3, to supplement just  
6           two pages of your filing with the correction.  
7           If someone could just walk me through that  
8           correction. It wasn't as clear to me perhaps  
9           as it would be if I had the backgrounds that  
10          you have.

11                   MR. TAYLOR: Sorry, Mary. Just for  
12           my benefit, could you repeat the question?

13                   MS. SCHWARZER: Sure. Exhibit  
14           Hearing 3 corrects pages that were filed in  
15           Exhibit 2 and makes changes. I'm not sure if  
16           the changes are sort of merely updating  
17           figures that were stricken or if there was a  
18           more present impact. I just would appreciate  
19           it if someone on the panel could help me  
20           understand what Bates page numbers they're  
21           substituting. I can see the titles at the  
22           top, but just tell me in layperson version  
23           what the changes do.

24    A.    (Kahl) Yeah, hold on one second.

1 (Pause)

2 A. (Kahl) Yes. Mary, if you're looking at that  
3 exhibit, there is a red-lined tariff Page 43  
4 and --

5 Q. I'm not in color, and I'm trying to put it  
6 into Exhibit 2.

7 A. (Kahl) Yeah, that would be Bates Page 23 from  
8 Exhibit 2.

9 Q. Okay. Just give me a second. I'm sure I can  
10 match it up. It's just a little -- Bates  
11 Page 23 for me in Exhibit 2 I think is  
12 Attachment 11, Page 11 of 11, Projected  
13 Delivery Service Loads. Am I looking at the  
14 wrong -- oh, that's the supplemental  
15 testimony. I'm sorry. You said Bates  
16 Page 23. Yes, I'm with you. Thank you.

17 Okay. So I'm looking at the original  
18 and the supplemental page. Can you tell me  
19 what the change is?

20 A. (Kahl) One second.

21 Q. Sure.

22 (Pause)

23 A. (Kahl) Yes. Mary, if you look at Exhibit 2,  
24 Page 23 --

1 Q. Yup.

2 A. (Kahl) -- and if you go to where it says  
3 Residential Cost of Gas Rate, and it's  
4 covered in a border --

5 Q. Yup?

6 A. (Kahl) -- the stricken number, the number  
7 that is struck, the number that is struck is  
8 44.12 cents.

9 Q. Yes.

10 A. (Kahl) That is referencing, if you go down  
11 two more, the initial cost of gas rate. And  
12 you'll see it there. And it should be  
13 referencing what the most recent current cost  
14 of gas rate is, which is 49.70, which is just  
15 two numbers down below that 44.12. So --

16 Q. I can see that. Thank you.

17 A. (Kahl) So in the correction I just put that  
18 in to show what the previously effective rate  
19 was.

20 Q. And it's the same changes in the next sort of  
21 outlined box as well; correct? The 45.01  
22 reflects the most recent charge as initially  
23 filed?

24 A. (Kahl) That's correct. And that also applies

1 to the bottom box there.

2 Q. And the weighted average, which my  
3 understanding is that that would be the  
4 overall rate for the average of all the  
5 months of the season, that's not on this  
6 page.

7 A. (Kahl) That's correct.

8 Q. Does it appear somewhere else?

9 A. (Kahl) Hold on one minute.

10 (Pause)

11 A. (Kahl) I do provide an average rate on  
12 Attachment NUI-CAK-14, which is --

13 Q. I'm sorry. If you could say that a little  
14 more slowly. NUI --

15 A. (Kahl) -- CAK-14

16 Q. Okay. Thank you.

17 A. (Kahl) That's on Bates Page 170.

18 Q. And if we could do the same exercise for the  
19 second page of Hearing Exhibit 3, which I  
20 believe is Bates Page 85 in the original  
21 petition -- no, Bates Page 25 in the original  
22 petition, tariff page --

23 A. (Kahl) Mary, you'd like me to walk you  
24 through that also?

1 Q. If you could just point out to me the  
2 differences between Exhibit 2 as originally  
3 filed, Bates Page 25, which is the revised  
4 Page 85 of the tariff, and Hearing Exhibit 3  
5 which made the change, if you could show  
6 me -- tell me what that change is.

7 (Pause)

8 A. (Kahl) Yes. On Bates Page 25 of the original  
9 filing, or Exhibit 2, this pertains to rates  
10 schedule for R10, low-income residential  
11 heating. And I believe for the distribution  
12 charge combined with the LDAC and the cost of  
13 gas I have -- I've stricken the amount of  
14 \$1.5334. But that amount should also be  
15 shown as a discount. So on the correction, I  
16 do show how much of a savings or discount  
17 that residential customer would be entitled  
18 to. Also, I believe I --

19 Q. I apologize. I don't doubt you at all, but I  
20 just can't -- the only difference I see right  
21 now on the new Page 25 is a stricken figure  
22 opposite the left-hand title of 45 percent  
23 low-income discount. I see a stricken figure  
24 on the new page that did not appear on the

1 old page.

2 A. (Kahl) Right.

3 Q. Perhaps I'm missing a great deal more, or  
4 not.

5 A. (Kahl) No. I think there are, in particular,  
6 two sets of numbers, so three numbers  
7 altogether that were not included initially  
8 that are -- and you see a credit of 64.06  
9 cents --

10 Q. Yeah, got it.

11 A. (Kahl) -- that wasn't there before. And then  
12 the last line of that block, 45 percent  
13 discount on the original, I'm only showing  
14 the updated credit of 42 and not the original  
15 of 32.92 cents.

16 Q. Okay. Thank you very much.

17 MS. SCHWARZER: I have no further  
18 questions for this panel.

19 CHAIRWOMAN MARTIN: All right.  
20 Thank you, Ms. Schwarzer.

21 Commissioner Goldner, do you have  
22 any questions?

23 COMMISSIONER GOLDNER: I do. Just  
24 a couple.



1 QUESTIONS BY COMMISSIONERS:

2 BY COMMISSIONER GOLDNER:

3 Q. Can the panel supply the amount, the total  
4 amount of volume of the portfolio that's  
5 hedged? Just if you look at your total  
6 portfolio, you're hedging 50 percent, 70  
7 percent, 40 percent? Just roughly. Doesn't  
8 have to be exact.

9 A. (Wells) Based on our overall sales forecast  
10 for Maine and New Hampshire, we are  
11 70 percent hedged for the November to March  
12 period.

13 Q. Okay. Thank you.

14 A. (Wells) So the April period is -- you know,  
15 would be not hedged at this point.

16 Q. Okay. Thank you.

17 And then the final question is it looks  
18 like you've successfully navigated a very  
19 difficult period. And I'd like to  
20 understand, just painting with broad strokes,  
21 how you think of your pipeline strategy, your  
22 storage strategy, your peaking strategy, how  
23 do you think of that, and how did you manage  
24 this very difficult situation looking at each

1 of the components and thinking about how you  
2 would keep the costs for ratepayers as low as  
3 possible? Because this filing is excellent.  
4 You've done a really good job. I'm just  
5 understanding -- I'd like to understand more  
6 and learn more about how you thought of the  
7 problem and how you successfully solved it.

8 A. (Wells) So, really, you know, just starting  
9 with, you know, when we were in the process  
10 of planning for this coming winter, you know,  
11 first -- there were actually several things  
12 going into the 2021-2022 winter that were a  
13 little bit different from what we had seen in  
14 the 2021 winter. The first was just, you  
15 know, based on the sales forecasts that we  
16 had, that we were operating under, we noticed  
17 that there was a need for additional  
18 supplies. And I talk about that in my  
19 prefiled testimony.

20 We have a peaking contract, too, which  
21 is a fixed price, must-take peaking  
22 transaction and a base load of  
23 PNGTS-delivered supply. And this is just  
24 based on when we looked at our 1 in 30 winter

1 projection, we realized that, you know, the  
2 portfolio that we used for 2021 wasn't quite  
3 enough. So we wanted to secure additional  
4 peaking supplies, first of all, to meet our  
5 reliability criteria for design day, design  
6 cold snap, and design winter.

7 You know, and then as we progressed, you  
8 know, we did the main filing August 15th as  
9 we typically do. We started noticing that  
10 prices were -- after that filing, in the  
11 lead-up to filing in New Hampshire, the  
12 prices were increasing significantly. So we  
13 began an internal discussion of, you know,  
14 while the prices in the, you know, \$4 to \$5  
15 NYMEX range are probably not going to result  
16 in, you know, catastrophically high prices,  
17 this price action that we were noticing, a  
18 significant increase of run-up to our winter  
19 cost of gas period, sort of, you know, was  
20 indicative of a scarcity of supply that we  
21 hadn't seen in prior winters. We've always  
22 been concerned and continue to be concerned  
23 about scarcity of pipeline capacity in New  
24 England, specifically scarcity of pipeline

1 capacity into the markets that we serve in  
2 northern New Hampshire, as well as, you know,  
3 Maine. And so adding that, like, just  
4 general concern for, you know, the balance of  
5 supply with demand on a more national level  
6 just led to a conversation internally of, you  
7 know, what makes sense to do for this winter  
8 that might be a little bit different than  
9 what we've done previously.

10 So we decided that, you know, it's  
11 always possible that we do, you know, a  
12 discretionary hedge that may not end up being  
13 ultimately to the benefit of customers. We  
14 don't know what's going to happen this coming  
15 winter. Prices are -- large price swings are  
16 not unusual in this market. But we decided  
17 that the risk of hedging and being wrong was  
18 far less than the risk of not hedging and  
19 being wrong. So, you know, it's always  
20 easier to come in into a winter cost of gas  
21 proceeding and say, you know, costs are high  
22 but we managed it, than to come back in the  
23 middle of January and say we've got a real  
24 big problem, you know, we're more than

1           25 percent under-collected.

2           And so we just tried to be proactive as  
3 possible in preparing for this winter. And,  
4 you know, hopefully we have the tools to  
5 respond to whatever market changes will occur  
6 in the pendency of the winter. You know,  
7 just in general, we always try as an  
8 organization to -- and, you know, I want to  
9 give a lot of props to -- it's not just me.  
10 It's our entire team -- you know, Rob Furino,  
11 who oversees our department, Ann Hartigan,  
12 who heads up our gas supply trading; Nick  
13 Routten, who works with her in scheduling,  
14 and myself -- we always try at the end of and  
15 during the winter to take lessons learned.  
16 And I'm sure, you know, in the lead-up to  
17 this winter, we will evaluate what we could  
18 have done better, how we can improve going  
19 forward. And it's really just that. To me,  
20 Commissioner, the real key to our navigating  
21 this is always having an open mind to how we  
22 can improve on what we've done in the past  
23 and not rest on our past success, you know,  
24 and to be humble, because this market will

1           chew you up and spit you out if you think you  
2           got it beat.

3       Q.    Thank you for that.  I spent some time in the  
4           commodity business myself, and I understand  
5           some of the challenges.

6                    Maybe just one last sort of tactical  
7           question.  How do you think of your pipeline  
8           strategy versus your storage strategy?  And  
9           how do you think of that and how do you  
10          manage that?

11       A.   (Wells) Well, I think, you know, one thing  
12           that we are evaluating is whether or not  
13           additional storage is a possibility.  You  
14           know, the pipeline -- we entered into  
15           pipeline capacity because at the time sort of  
16           the battle that we have been fighting, so to  
17           speak, relative to managing commodity costs  
18           has been managing exposure to local New  
19           England-based pricing.  That's been where the  
20           volatility has been that we have faced as a  
21           company for the last, call it five to ten  
22           years.  What has happened -- what's  
23           transpired in the last few months is  
24           indicative of more we should expect

1           volatility both on the, you know,  
2           transportation costs in New England, as well  
3           as the supply itself. And so that begs the  
4           question of whether or not it makes sense to  
5           add storage capacity into our portfolio. And  
6           we're exploring that now. We've reached  
7           out to -- prior to this hearing we reached  
8           out to both Tennessee Gas Pipeline and to  
9           Union Gas, or to Enbridge Gas as it's been  
10          renamed, to inquire about whether there are  
11          opportunities to add more storage. Because  
12          obviously the advantage of storage in this  
13          market going into the volatile November  
14          through March period is that you'd have a  
15          flexible fixed price -- you know, end-cost  
16          certain supply that can also give you  
17          advantages in meeting daily load swings, as  
18          well as seasonal price spikes. So we are, to  
19          this point -- prior to this winter, I'd say  
20          we had a really good balance. Based on what  
21          we're seeing in the market, I'm questioning  
22          whether or not it would make sense to add  
23          more storage to our portfolio. And we have  
24          some opportunities to do so. You know, when

1 we initially got our Enbridge storage, it  
2 was -- we only had 40,000 decatherms of  
3 takeaway from that storage, you know, via  
4 Union, TransCanada and Portland pipelines.  
5 Next winter we'll have 60,000 when the WXP  
6 project goes into service. We have 50,000  
7 now. So there's obviously an opportunity to  
8 increase storage in the Dawn Hub, which would  
9 have the effect of really reducing the need  
10 to buy gas mid-winter if we were able to get  
11 additional storage capacity at rates that are  
12 beneficial to customers.

13 We're also looking at whether or not  
14 it's possible, even with our limited amount  
15 of Tennessee capacity, to add storage  
16 quantity there. That's, you know --  
17 obviously we have less capacity that could  
18 access storage there. But, you know, it's  
19 also traditionally a cheaper storage supply.  
20 So we obviously want to be able to maximize  
21 any of that lower cost storage before we were  
22 to go into what is a -- you know, obviously  
23 we have much more capacity on Portland and  
24 upstream pipes than we do on the Tennessee



1 side. But, you know, to the extent we can  
2 find competitive supply -- or storage  
3 options, rather, on the Tennessee side, we'd  
4 like to exhaust those first before increasing  
5 storage on Dawn Hub.

6 So it's a good question and a timely one  
7 because, you know, we're thinking about the  
8 same types of things, whether or not it makes  
9 sense to add storage. And, you know, even  
10 when we initially bought -- started adding  
11 pipeline capacity, we identified it as one,  
12 you know, and the next step being, you know,  
13 is it possible to increase our storage as  
14 well, and would it be beneficial.

15 And so we're just beginning to undertake  
16 that discussion internally, starting with  
17 reaching out to the respective vendors and  
18 seeing what kind of additional storage  
19 capacity might be available.

20 Q. Thank you. So, yeah, I would just like to  
21 thank the Company for an excellent filing and  
22 very helpful testimony. Thank you. That's  
23 all.

24 CHAIRWOMAN MARTIN: All right. And

1           thank you, because you did such a good job, I  
2           don't have any other questions.

3                         Mr. Taylor, do you have any  
4           redirect?

5                         MR. TAYLOR: I do not. Thank you.

6                         CHAIRWOMAN MARTIN: Okay. Then  
7           without objection, we'll strike I.D. on  
8           Exhibits 1 through 6 and admit those as full  
9           exhibits.

10                        Is there anything else we need to  
11           cover before we hear closings?

12                        MR. TAYLOR: No.

13                        CHAIRWOMAN MARTIN: All right.  
14           Then we'll start with Mr. Kreis.

15                        MR. KREIS: Thank you, Madam  
16           Chairwoman. My assessment of the Company's  
17           filing is similar to what I just heard  
18           Commissioner Goldner articulate and also, I  
19           think, with the tenor of the comments that  
20           the Department has made. These are very  
21           challenging times for both electric and  
22           natural gas customers in New Hampshire. And  
23           thinking about the residential customers at  
24           this utility, who have relatively little

1 flexibility with respect to what they do in  
2 the face of volatility, I think Unitil and  
3 its subsidiary, Northern, have done an  
4 excellent job of doing as much as it possibly  
5 can to responsibly manage its portfolio in a  
6 manner that will protect customers as much as  
7 possible. And so therefore I suggest that  
8 the Commission approve the Company's filing  
9 and all of the rates requested therein as  
10 expeditiously as possible.

11 CHAIRWOMAN MARTIN: Thank you, Mr.  
12 Kreis.

13 Ms. Schwarzer.

14 MS. SCHWARZER: Thank you, Madam  
15 Chairwoman. The Department of Energy does  
16 not have the analysts or witnesses, so the  
17 Department has no opinion on the requested  
18 cost of gas filing in this docket with regard  
19 to the actual cost of gas.

20 As others have done, the Department  
21 of Energy is highly appreciative of the  
22 excellent quality of this filing and  
23 appreciates a working relationship with  
24 Northern and the OCA. And I have no further

1           comments. Thank you.

2                       CHAIRWOMAN MARTIN: All right.

3           Thank you, everyone. With this, we'll take  
4           this matter under advisement. We're  
5           adjourned.

6                       (Hearing concluded at 10:25 a.m.)

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