

- b. For 2021, please provide the revenue collected through the currently effective Foss Special Contract Rate and the revenue that would have been collected if Foss was on the currently effective G-52 tariff.
- c. Calculate the difference in dollar impact between the two rates mentioned in part b.
- d. For 2021, provide the fixed cost, in dollars, attributed to Foss.
- e. For 2021, how much of the fixed cost attributed to Foss, in dollars, was covered/paid by Foss?
- f. Please explain how the fixed costs that Foss avoids because of its Special Contract rate are recovered. If those costs are recovered from delivery customers, please respond whether they are recovered from all delivery customers (Residential, Commercial, and Industrial) or only from a specific delivery customer class. If from a specific delivery customer class, please indicate which one.

2. Northern has stated that the “scaling factor” adjustment to the marginal costs as implemented in the recent rate case is inappropriate for special contract rates. Please indicate how the removal of the scaling factor impacts the special contract rate. Provide an estimate of the percentage impact.

3. Has Northern considered establishing a tariffed rate for large customers such as Foss based on a minimum usage requirement or another parameter? What would be the impact to Foss’s transportation costs in dollars?

4. How many New Hampshire employees did Foss have at the end of the following years: 2017, 2018, 2019, 2020, 2021; and how many are there today?

5. For each month in 2021, please provide the minimum usage/take requirement determined in the special contract for natural gas and compare this to the Foss actual usage for equipment that runs on gas only.

6. If Foss had fully transitioned to electricity in 2021 for all existing equipment capable of being powered by electricity, what would be the impact on its gas usage? Please provide an analysis of the impact on the revenue and compare it with the marginal cost, as well as the minimum annual payment.

7.

- a. Please provide Foss’s total operating costs for 2021 (in dollars).
- b. Please provide the operating costs attributable to the Special Contract Rate (in dollars).
- c. What percentage of Foss’s total 2021 operating costs are attributable due to the Special Contract rate?

d. What percentage of Foss's total 2021 operating costs are comprised of natural gas commodity costs? Please provide the natural gas commodity costs in dollars as well.

8. What impact would a 20 percent decrease in natural gas transportation costs have on Foss's net income? Please provide both the dollar and percent impact.

9.

- a. Please quantify the total Power (MW) in 2021 required by Foss (gas and electricity). Then provide the 2021 Power (MW) required to run the equipment that must be powered by gas.
- b. For 2021 calculate Foss's actual spend (transportation and commodity costs) for gas and also the total spend for electricity.

WITNESSES:

Panel 1	
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