

**NATIONAL FUEL GAS DISTRIBUTION CORPORATION
NEW YORK DIVISION
RESPONSE TO
REQUEST FOR INFORMATION
RETAIL ENERGY SUPPLY ASSOCIATION (“RESA”)
FIRST SET OF INFORMATION REQUESTS TO UTILITIES
CASES 98-M-1343, 12-M-0476, 15-M-0127**

Request No.:	RESA – Utilities 1-12	Date of Request:	February 16, 2017
Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	February 27, 2017
Subject:	First Discovery Request to Utilities – Questions 1-12	Witness:	Rates & Regulatory Affairs Panel

Directed to:

Central Hudson Gas & Electric Corp.;
Consolidated Edison Company of New York, Inc.;
Orange & Rockland Utilities, Inc.;
National Fuel Gas Distribution Corp.;
Brooklyn Union Gas Co.,
KeySpan Gas East Corp., and
Niagara Mohawk Power Corp. d/b/a National Grid;
New York State Electric & Gas Corp.; and
Rochester Gas and Electric Corp.

REQUEST

For purposes of these requests, "document" means any written, recorded, or graphic material of any kind, whether prepared by you or by any other person, that is in your possession, custody, or control. The term "document" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form.

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1. Please provide historical price to compare information by month for residential and small commercial customers (by rate class) for the period of January 2006 through December 2016. For purposes of this data response, the utility price to compare is the fully inclusive, unitized rate (per kWh or per therm) that would be charged to a customer receiving commodity energy supply (electricity or natural gas) service from the electricity or natural gas utility. While providing this information:

- a. Please factor in all bypassable pricing components (defined as any rate, charge, adder or fee that a customer would avoid if the customer were to receive commodity energy supply from an ESCO) in the derivation of the monthly price to compare, including any reconciliation adjustments, any Market Supply Charge adjustments, and any Merchant Function Charge adders.
- b. Please show separately by month the utility price to compare with and without any reconciliation adjustments factored into the price. Indicate the time period any reconciliation adjustment covered as well as the date any retroactive reconciliation adjustment was applied to monthly prices to compare.
- c. On a monthly basis, for the period of January 2006 to December 2016, please provide any expenses related to calling centers that were allocated to the utility price to compare.
- d. On a monthly basis, for the period of January 2006 to December 2016, please provide any expenses related to billing or other overhead expenses that were allocated to the utility price to compare.
- e. On a monthly basis, for the period of January 2006 to December 2016, please provide how much of the regulated all-in rate of return collected by each utility was allocated to the utility price to compare.

RESPONSE:

Please see attached Statement Type: NGS and Statement Type: MFC filed with the Commission on November 28, 2016 for December 2016 (Effective with Usage On and After December 1, 2016). Comparable statements for all other months within the period of time covered by this request are available on the Commission's Document Matters Management system at:

https://www2.dps.ny.gov/ETS/search/searchShortcutCancelledSSA.cfm?service_desc=GAS&company_id=3569008&psc_num=8&doc_desc=STATEMENT

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5. Do your current energy supply charges include any risk premium, adder or placeholder amount to account for future regulatory decisions that may have a cost impact on load serving entities in New York. If yes, please describe each such premium, adder or placeholder and describe the accounting treatment of any dollars collected under such a mechanism. If not, please describe how future new load serving costs would be reflected in and recovered through utility energy supply charges.

RESPONSE:

No.

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Request No.:	RESA – Utilities 1-12	Date of Request:	February 16, 2017
Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	March 3, 2017
Subject:	First Discovery Request to Utilities – Questions 1-12	Witness:	Rates & Regulatory Affairs Panel

Directed to:

Central Hudson Gas & Electric Corp.;
Consolidated Edison Company of New York, Inc.;
Orange & Rockland Utilities, Inc.;
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6. For the period of January 2006 through December 2016, please identify all instances where any fixed price hedge(s) were incorporated into the energy supply charges of the default service provided by your utility. For each energy hedge transaction, please indicate:
 - a. Fixed price of the energy hedge

- b. Term of the energy hedge (i.e., the calendar months in which the hedge was supplied to default service customers)
- c. Size of the energy hedge

RESPONSE:

Please see attached Statement Type: NGS Statement No. 184 Workpaper 1 Section F. COST OF GAS FOR GAC SALES filed with the Commission on November 28, 2016 for December 2016 (Effective with Usage On and After December 1, 2016) in Case 97-G-1178. Under the section titled Gas Purchases – Long Term/Short Term, the Forward Pricing (LT) represents fixed price cost of gas incorporated into the Monthly Natural Gas Supply Charge. Comparable workpapers for the months of February 2011 through November 2016 covered by this request are available on the Commission's Document Matters Management system at:

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-G-1178&submit=Search>

With regard to the period January 2006 to January 2011, this data is not available on the Commission's Document Matters Management system and production of such data would be unduly burdensome because it would require the Company to develop information. Information regarding the background and rationale for the Unwaste NY program is readily available on the website: <http://www.unwasteny.org>.

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Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	February 27, 2017
Subject:	First Discovery Request to Utilities – Questions 1-12	Witness:	Gas Supply Administration Panel

Directed to:

Central Hudson Gas & Electric Corp.;
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7. Please provide copies of workpapers showing the derivation of the Merchant Function Charge from January 2006 through December 2016.

RESPONSE:

See the Company's response to RESA IR-1.

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Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	February 27, 2017
Subject:	First Discovery Request to Utilities – Questions 1-12	Witness:	Rates & Regulatory Affairs Panel

Directed to:

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8. Please provide copies of all purchase power agreements with entities that have supplied power used by the utility in meeting its default service obligation from January 2006 through December 2016. The name of the counterparty may be redacted if necessary to preserve confidentiality.

RESPONSE:

Not applicable.

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9. Please provide copies of all documents describing the company's policies for managing its electric and gas supply portfolio from January 2006 through December 2016.

RESPONSE:

The Company recommends that the RESA review New York State Public Service Commission

Case Number 16-G-0257, entitled Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of National Fuel Gas Distribution Corporation for Gas Service. Extensive information relating to the Company's policies and practices for managing its gas supply portfolio is provided in the referenced case, including Direct Testimony and Exhibits of the Gas Supply Administration Panel.

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Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	March 3, 2017
Subject:	First Discovery Request to Utilities – Questions 1-12	Witness:	Rates & Regulatory Affairs Panel

Directed to:

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12. To gas utilities only:

- a. For the period of January 2006 to December 2016, please identify by month any off-system sales revenues that impacted the utility price to compare by 3% or more, i.e. created an adjustment in the utility price to compare that resulted in a price change of 3% or more.

- b. For the period of January 2006 to December 2016, please identify by month the amount of any capacity release credits that were applied to sales system customers but not to customers served by ESCOs?
- c. For the period of January 2006 to December 2016, please identify by month the percentage deviation in that actual purchase gas costs included in the gas adjustment clause as compared to the estimated costs used in the determination of the monthly gas adjustment clause.
- d. For the period of January 2006 to December 2016, please specify the dollar amount and time period associated with any cost recovery deferrals, beyond the normal reconciliation mechanism, of any gas costs included in the gas adjustment clause.

RESPONSE:

Please see attached Statement Type: NGS and Statement Type: MFC filed with the Commission on November 28, 2016 for December 2016 (Effective with Usage On and After December 1, 2016). The refund credit for Off-System Sales/Capacity Release/SC11 Margin is included on the Monthly Gas Supply Charge Statement and is effective for the winter period of November through March. Comparable statements for all other months within the period of time covered by this request are available on the Commission's Document Matters Management system at:

https://www2.dps.ny.gov/ETS/search/searchShortcutCancelledSSA.cfm?service_desc=GAS&company_id=3569008&psc_num=8&doc_desc=STATEMENT

The details of the filing which includes the Off-System Sales, Capacity Release Credits and SC 11 Margin for the previous twelve months ended September are included in the workpapers filed with the Commission each November. See attached filing that was included with the workpapers filed on October 28, 2016 for November 2016 (Effective with Usage On and After November 1, 2016) in Case 97-G-1178. Comparable workpapers for the months of February 2011 through November 2016 (note that the filing is only included in the month of November, the first month the credit is effective) covered by this request are available on the Commission's Document Matters Management system at:

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-G-1178&submit=Search>

With regard to the period January 2006 to January 2011, this data is not available on the Commission's Document Matters Management system and production of such data would be unduly burdensome because it would require the Company to develop information. Information regarding the background and rationale for the Unwaste NY program is readily available on the website: <http://www.unwasteny.org>.

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Request No.:	RESA – Utilities Question 15	Date of Request:	March 22, 2017
Requested By:	Retail Energy Supply Association (RESA)	Reply Date:	April 3, 2017
Subject:	Historic Bill Calculator	Witness:	Rates & Regulatory Affairs Panel

Directed to:

Central Hudson Gas & Electric Corp.;
Consolidated Edison Company of New York, Inc.;
Orange & Rockland Utilities, Inc.;
National Fuel Gas Distribution Corp.;
Brooklyn Union Gas Co.,
KeySpan Gas East Corp., and
Niagara Mohawk Power Corp. d/b/a National Grid;
New York State Electric & Gas Corp.; and
Rochester Gas and Electric Corp.


REQUEST

15. Please provide an electronic copy, with formulas intact, of (a) your company’s historic bill calculator referred to in the preamble DPS-Utility 1-4 and (b) the data base(s), in electric form, that your company uses to apply the historic bill calculator to ESCO product offerings.

RESPONSE:

The Company objects to this information request to the extent it requests the production of proprietary or commercially sensitive information including, but not limited to, proprietary software, data, programs or databases, the release of which could violate licensing agreements, copyright laws, or proprietary rights of third parties. Subject to and without waiving this objection, the Company provides the following response:

The core functionality of the calculation is provided in the Company's response to DPS-Utility-3. Access to the Company's calculator is provided from the Company's public web site. ESCOs may access the results of the calculation (for the most recent 12 months, to the extent the Company issued a bill to the customer for ESCO supply services) using validation criteria available to the ESCO at: <https://acctsvcs.nationalfuelgas.com/HistRateCompUnauth.aspx>



National Fuel

Historical Bill Comparison

Non-utility energy service companies, also called retail suppliers ("ESCO" or "Marketers"), are able to supply natural gas at unregulated market-based prices. An individual can choose an energy supplier from among these companies or can continue to purchase natural gas from National Fuel.

This historical bill comparison tool allows a New York National Fuel customer to compare the bill received for natural gas supplied by the marketer over the past 12 months to the bill that would have been received if the gas supply had been provided by National Fuel. The feature is designed only for those customers for whom National Fuel prepares the bill. If a marketer issues its own bills, a customer can contact them for the total billing amounts for applicable months.

In our continuing effort to keep your account information safe, National Fuel requires you enter some account information to verify your account. Please choose either a 7 or 9 digit account number, then enter the information requested to view your historical rates.

7 Digit Account Number

9 Digit Account Number

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For the reasons provided above, the Company objects to the production of its historic bill calculator and data base.