

**Exhibit \_\_\_\_ (CAP-R-7)**  
**Response to CNG DPS-30 Rate Case Expense**

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE  
INTERROGATORY RESPONSE**

**Corning Natural Gas Corporation  
Case 16-G-0369  
Gas Rates**

**Request No.:** CNG/DPS-30  
**Requested By:** Corning Natural Gas  
**Name of Respondent:** Allison Esposito  
**Date of Request:** November 3, 2016  
**Response Date:** November 10, 2016  
**Subject:** Rate Case Expense

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**Question 1:** Please state the amounts of the allowed rate case expenses in Commission rate orders issued in 2014 – 2016 for other major gas and electric utilities.

**Response:** Staff objects to this question as it seeks information that is publicly and readily available to Corning. Accordingly, it is outside the scope of discovery as set forth in 16 NYCRR §5.8.

**Question 2:** How many interrogatories did those other utilities receive from DPS Staff?

**Response:** The approximate number of Staff IRs are as follows:

- St. Lawrence (15-G-0382): 320
- KEDNY/KEDLI (16-G-0058 & 16-G-0059): 493
- O&R (14-E-0493 & 14-G-0494): 566
- Con Edison (13-E-0030; 13-G-0031; 13-S-0032): 775
- Con Edison (16-E-0060 & 16-G-0061): 734
- National Fuel Gas (16-G-0257): 425
- NYSEG/RGE (15-E-0283 & 15-G-0284; 15-E-0285 & 15-G-0286 ): 544 (does not include pre-filed IRs)
- Central Hudson (14-E-0318 & 14-G-0319): 573 (does not include pre-filed IRs)

**Question 3:** With regard to Staff's comparison of the outside legal and consulting costs incurred by Corning with those incurred by St. Lawrence Gas Company:

- a. Did Staff take into consideration that St. Lawrence is a wholly owned subsidiary of a Canadian parent, Enbridge Inc., which owns a number of large utilities and employs thousands, while Corning is the principal utility subsidiary of a small holding company? If so, please explain how. If not, please explain why not.

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE  
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**Response to CNG-DPS-30 (continued)**

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- b. Has Staff determined the extent to which St. Lawrence relies on services provided by Enbridge or other affiliates of Enbridge to support its regulatory activities? If so, please describe that determination. If not, please explain why not.
- c. Did Staff identify internal and allocated affiliate costs for St. Lawrence as compared to Corning for the same functions? If so, please describe the results of that identification and comparison. If not, please explain why not.

**Response**

- a. Yes, Staff considered that St. Lawrence is a wholly owned subsidiary of Enbridge, Inc. However, as stated on page 55 of Staff witness Allison Esposito's testimony, St Lawrence hires outside legal counsel and consultants to perform its rate case work, rather than relying on services provided by Enbridge or its other affiliates.
- b. See response to a.
- c. See response to a.