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U.S. General Services Administration

August 14, 2020

Via Electronic Filing
Mrs. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005

RE: Formal Case No. 1162
In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service
Direct Testimony of the General Services Administration Exhibit GSA (A)

Dear Mrs. Westbrook-Sedgwick:

Enclosed please find the Direct Testimony of Dr. Dennis Goins on behalf of the United States General Services Administration in the above referenced proceeding.

If there are any questions regarding this matter, please contact me at (202) 969-7136.

Sincerely,

/s/ Kristi Singleton

Kristi Singleton
Assistant General Counsel
Real Property Division (LR)
General Services Administration
1800 F Street, NW
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Enclosure

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Direct Testimony of Dr. Dennis Goins has been served this August 14, 2020 on the parties, including:

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/s/ Kristi Singleton
Kristi Singleton

Exhibit GSA (A)

DISTRICT OF COLUMBIA
BEFORE THE
PUBLIC SERVICE COMMISSION

FORMAL CASE NO. 1162

IN THE MATTER OF THE APPLICATION OF WASHINGTON GAS LIGHT COMPANY FOR AUTHORITY TO INCREASE EXISTING RATES AND CHARGES FOR GAS SERVICE

DIRECT TESTIMONY OF
DENNIS W. GOINS, PH.D.
ON BEHALF OF THE
GENERAL SERVICES ADMINISTRATION

August 14, 2020

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ON BEHALF OF THE
GENERAL SERVICES ADMINISTRATION

INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Dennis W. Goins. I operate Potomac Management Group, an economics and management consulting firm. My business address is 5801 Westchester Street, Alexandria, Virginia 22310.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I received a Ph.D. degree in economics and a Master of Economics degree from North Carolina State University. I also earned a B.A. degree with honors in economics from Wake Forest University. Following graduate school I worked as a staff economist at the North Carolina Utilities Commission (NCUC), where I testified in numerous cases involving electric, gas, and telephone utilities. Since leaving the NCUC, I have worked as an economic and management consultant to firms and organizations in the private and public sectors. My assignments focus primarily on policy, planning, and pricing issues involving firms that operate in energy markets. For example, I have conducted detailed analyses of product pricing, cost of service, rate design, and interutility planning, operations, and pricing issues; prepared analyses related to utility mergers, transmission access and pricing, and the development of competitive markets; evaluated and developed regulatory incentive mechanisms applicable to utility operations; and assisted clients in analyzing and negotiating interchange agreements and power and fuel supply contracts.

I have submitted testimony and affidavits and provided technical assistance in more than 200 proceedings before state and federal agencies as an expert in cost of service, rate design, competitive market issues, regulatory policy, and utility planning and operating practices. These agencies include the Federal Energy Regulatory Commission, the Government Accountability Office, state courts in Iowa, Montana, and West Virginia, and regulatory agencies in Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Missouri, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Texas, Utah, Vermont, Virginia, West Virginia, Wyoming, and the District of Columbia.[1]

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[1] *See* Exhibit GSA (A)-1.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I previously filed testimony in Formal Case Nos. 869, 1053, 1076, 1087, 1103, 1116, 1121, 1137, 1139, 1142, and 1156.

Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A. I am appearing on behalf of the General Services Administration (GSA), which represents the Federal Executive Agencies—that is, all Federal facilities served by Washington Gas Light Company (WGL).

Q. WHAT ASSIGNMENT WERE YOU GIVEN WHEN YOU WERE RETAINED?

A. I was asked to undertake two primary tasks:

1. Review WGL's application—including supporting data and information—to increase its rates and charges for gas service in the District of Columbia.
2. Evaluate the reasonableness of WGL's proposals and, if necessary, recommend changes.

Q. WHAT INFORMATION DID YOU REVIEW IN CONDUCTING YOUR EVALUATION?

A. I reviewed WGL's initial and supplemental filings, including direct and supplemental direct testimony, exhibits, and responses to data requests. I also reviewed orders and testimony from selected prior WGL cases before this Commission and the Maryland Public Service Commission. Finally, I reviewed other publicly available information related to issues addressed in my testimony.

Q. ARE YOU SPONSORING ANY EXHIBITS TO ACCOMPANY YOUR DIRECT TESTIMONY?

A. Yes. I am sponsoring the following exhibits:

- GSA (A)-1 – Qualifications of Dennis W. Goins
- GSA (A)-2 – Selected Data Request Responses.

The testimony and attached exhibits were prepared by me or under my direct supervision and control. I relied on my personal knowledge and expertise in developing my testimony and exhibits, as well as on the materials noted above.

CONCLUSIONS AND RECOMMENDATIONS

Q. WHAT CONCLUSIONS HAVE YOU REACHED?

A. On the basis of my review and evaluation, I have concluded that WGL has proposed a Revenue Normalization Adjustment (RNA) to use in adjusting class-specific rates such that the company's monthly billed revenues track revenues authorized in a prior rate case proceeding. That is, the proposed RNA is designed to improve WGL's likelihood of recovering its Commission-approved test-year base revenues between rate cases. Under its proposal, each month WGL will compute an RNA rate-specific credit or charge (adjusted to reflect customer growth) to the monthly distribution charge for firm customers.[2] The RNA credit or charge will be applied to customer bills with a two-month lag between estimation and billing impact.

Q. WHAT DO YOU RECOMMEND ON THE BASIS OF YOUR CONCLUSIONS?

A. I recommend that the Commission reject WGL's proposed RNA for the reasons discussed later in my testimony. If the Commission decides to approve the RNA, I recommend that the monthly adjustment factor be capped at $0.03 per therm instead of the $0.05 per therm cap proposed by WGL.[3]

REVENUE NORMALIZATION ADJUSTMENT

Q. PLEASE BRIEFLY DESCRIBE WGL'S PROPOSED RNA.

A. WGL's proposed RNA is a ratemaking mechanism that decouples WGL's post-rate case revenues from sales, thereby insulating the company's revenues from variability due to such factors as extreme weather and end-use efficiency gains. Under the RNA, WGL would be allowed to adjust its base (delivery) rates on a monthly basis to reflect deviations in the revenue per customer it collects from adjusted test-year revenues approved in the company's most recent base rate case.

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[2] *See* Exhibit WG (H) at 12-15.

[3] My decision to testify only on the RNA should not be considered as my agreement or disagreement with any other aspects of WGL's rate filing.

Q. IS THIS THE FIRST TIME WGL HAS ASKED THIS COMMISSION TO APPROVE AN RNA?

A. No. WGL proposed an RNA in three prior cases before this Commission—Formal Case Nos. 1054 (2006), 1079 (2009), and 1137 (2016). As a result of a settlement in the 2006 rate case, the RNA was deemed withdrawn. However, the Commission denied WGL's RNA requests in the 2009 and 2016 cases.[4]

Q. WHAT REASONS DOES WGL CITE FOR NEEDING AN RNA?

A. WGL witness Paul H. Raab lists three primary reasons:[5]

- Factors beyond WGL's control can produce significant variability in the company's revenues, and it should not be rewarded (through higher than expected revenues) or penalized (through lower than expected revenues) because of this variability.
- WGL's current rate structure is out of sync with its underlying cost structure since most of its non-gas costs are fixed in the short run but are primarily recovered through volumetric rates.
- Because of the virtual certainty that sales will deviate from weather-normal sales, there is near-certainty that either WGL or ratepayers will be disadvantaged without a mechanism such as an RNA to keep the company's collected revenues at Commission-authorized levels.

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[4] District of Columbia Public Service Commission, Formal Case No. 1079, Order No. 16101 (December 17, 2010) at ¶34, and Formal Case No. 1137, Order No. 18712 (March 3, 2017) at ¶¶224-229.

[5] *See* Exhibit WG (G) at 18-19.

Q. DO THESE REASONS JUSTIFY APPROVING AN RNA?

A. No. Regulators approve rates that are intended to give a utility a reasonable opportunity to earn its allowed rate of return on invested property. There is no guarantee that the utility will earn its allowed return, only that it should have a reasonable opportunity to do so. Regulators have the authority to reduce rates to address excess earnings, while utilities can always file rate cases to address earnings shortfalls. As a result, the primary focus in determining the need for and efficacy of an RNA should be whether WGL's desire to mitigate persistent earnings shortfalls or excesses related to revenue variability outweigh the potential negative impacts to ratepayers of such a mechanism, including increased risk and rate volatility.

Q. WOULD THE RNA SHIFT RISK FROM WGL TO RATEPAYERS?

A. Yes. The RNA will allow WGL to shift the risk of recovering less than its authorized level of revenues to ratepayers. While it is true that the RNA would also allow ratepayers to shift the risk of paying more than WGL's authorized level of revenues, I have seen no analysis or evidence to show that the expected long-term value to customers of limiting potential excess revenues would be significantly greater than the risk of having to pay increased rates to allow WGL to recover potential revenue shortfalls. Stated somewhat differently, I have seen no evidence that the lack of an RNA in WGL's tariff creates a significant economic advantage for either customers or WGL.

Q. HAS WGL PRESENTED ANY EVIDENCE OF THE MAGNITUDE OF USAGE AND REVENUE VARIABILITY?

A. Yes. Witness Raab conducted a simulation in which he used data (billed volumes and customers, and usage per customer) for fiscal years 2012 – 2019 as well as billing determinants and rates approved in WGL's two most recent rate cases to assess usage variability and estimate annual variations in realized versus authorized revenues in FY2014 – FY2016 for rates approved in Formal Case No. 1093 and FY2018 – FY2019 for rates approved in Formal Case No. 1137.[6] According to this analysis, in FY2014 – FY2016 WGL's billed revenues would have exceeded revenues authorized in Formal Case No. 1093 by about $6.74 million. In contrast, during FY20118 – FY2019 the company's billed revenues would have been about $8.84 million less than revenues authorized in Formal Case No. 1137.

Q. WHAT DO YOU CONCLUDE FROM WGL'S ANALYSIS?

A. The information presented in Exhibit WG (G)-5 confirms that annual customer usage and revenues can vary significantly from test-year billing units and authorized revenues. However, data presented in the exhibit also confirm that over the five fiscal years (FY2014 – FY2016 and FY2018 – FY2019) that witness Raab compared WGL's authorized revenues versus estimated billed revenues, WGL's aggregate revenue shortfall was only around $2.1 million—less than 0.4 percent of aggregate authorized revenues in the period. (See Table 1 below.)

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[6] *See* Exhibit WG (G)-5. The exhibit only shows revenue variability information for full fiscal years in which rates approved in Formal Case Nos. 1093 and 1137 were in effect. As a result, no revenue variability information is shown for fiscal years 2012, 2013, and 2017.

Table 1. WGL Revenues

Fiscal Year	Authorized Annual Rev	Calculated Rev (WGL)	Rev Surplus (Shortfall)	Diff (%)
2014	$100,879,640	$107,720,204	$6,840,564	6.78%
2015	$100,879,640	$109,024,531	$8,144,891	8.07%
2016	$100,879,640	$92,636,598	($8,243,042)	-8.17%
2018	$115,284,528	$111,391,920	($3,892,607)	-3.38%
2019	$115,284,528	$110,336,549	($4,947,979)	-4.29%
Total	$533,207,975	$531,109,802	($2,098,172)	-0.39%

Source: Exhibit WG (G)-5.

Moreover, the most recent aggregate revenue variability shown in Exhibit WG (G)-5 appears to be primarily due to the residential heating class. For example, in FY2018 – FY2019 WGL's estimated aggregate billed revenues would have been $8.84 million *less* than authorized revenues. During the same period, billed revenues for the residential heating class would have been $8.11 million *less* than authorized revenues—that is, about 92 percent of the total estimated aggregate shortfall.[7] In aggregate, only $0.73 million (around 8 percent) of the shortfall would have been attributed to all other customer classes.

Q. DO THESE FINDINGS RAISE QUESTIONS ABOUT THE NEED FOR AN RNA?

A. Yes. While WGL's annual billed revenues may exceed or fall short of authorized revenues, the small cumulative revenue shortfall for the five fiscal years examined in Exhibit WG (G)-5 does not indicate an urgent need for an RNA. Moreover, data shown in Exhibit WG (G)-5 certainly raise the

[7] *Id*. During the same period, aggregate billed revenues for C&I and GMA heating customers *exceeded* authorized revenues by $0.7 million.

question whether an RNA—if needed—should be applicable to all firm customers, in particular when one class seems to contribute so heavily to the usage and revenue variability. For example, average annual volumes billed to residential heating customers in FY2018 – FY2019 were more than 11.3 million therms (around 11 percent) less than billing determinants used to set rates for these customers in Formal Case No. 1137. During the same period, aggregate average annual billed volumes for all other heating customers (C&I and GMA customers) were only 0.75 million therms (about 0.8 percent) less than authorized billing volumes.[8]

Q. SINCE ITS LAST RATE CASE, HAS WGL ANALYZED HOW DECOUPLING WITH AN RNA WOULD HAVE AFFECTED ITS EARNED RETURN ON EQUITY?

A. No. However, WGL indicates that based on the simulated results shown in Exhibit WG (G)-5, the estimated revenue shortfalls would have reduced its return on rate base by about 0.52 percent in 2018 and 0.66 percent in 2019.[9]

Q. DID WGL CONSIDER THE POTENTIAL IMPACTS OF THE COVID-19 PANDEMIC WHEN DESIGNING ITS PROPOSED RNA?

A. No. WGL filed this case (including its request for an RNA) before the onset of the COVID-19 pandemic.

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[8] *Id*. During this period, revenue shortfalls for smaller (<3075 therms) C&I and GMA customers were offset by revenue surpluses for larger (>3075 therms) customers.

[9] *See* Exhibit GSA (A)-2 (WGL Response to OPC DR 12-5). *See also Id*. at WGL Responses to OPC DR 12-6 and 12-7.

Q. HAS WGL SUBSEQUENTLY MODIFIED ITS RNA PROPOSAL AND ITS SALES FORECAST TO REFLECT THE POTENTIAL IMPACTS OF THE COVID-19 PANDEMIC?

A. No.[10]

Q. SHOULD THE FACT THAT WGL'S RNA AND ITS SALES FORECAST DO NOT REFLECT POTENTIAL IMPACTS OF THE COVID-19 PANDEMIC BE A CAUSE FOR CONCERN?

A. Yes. No party in this case—including WGL—can know with any degree of certainty how the pandemic may affect post-test-year aggregate delivered gas volumes and interclass volume shifts as residential customers, businesses, and government entities adjust how and where they operate and work. This uncertainty means that we should reasonably expect test-year billing determinants (both aggregate and class-specific) to differ (perhaps significantly) from post-case billed volumes. WGL might contend that this uncertainty simply reinforces its argument for an RNA. However, I would counter that such uncertainty during a period of unprecedented pandemic conditions supports the notion that now is not the time to shift all of the business risk WGL is trying to avoid on to customers. If the RNA is approved and post-case non-residential volumes fall significantly below rate case billing determinants due to COVID-related business closings and reduced operations, surviving businesses will bear the brunt of the RNA economic burden. That outcome would be neither fair nor reasonable and would only exacerbate the economic hardship many businesses are facing.

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[10] *See Id*. at WGL Responses to OPC DR 15-3, 15-4, and 15-5.

Q. WHAT DO YOU RECOMMEND?

A. I recommend that the Commission reject WGL's proposed RNA. WGL has not shown that shifting additional business risk to ratepayers is in the public interest. In addition, WGL has not adequately explained why the RNA—if necessary—should be applicable to all firm service rate classes. Furthermore, in light of the economic stress and uncertainty customers are experiencing due to the pandemic, now is not the time to expose customers to potentially wide swings in monthly bills that could arise if the RNA is approved.[11] Reducing WGL's business risk should not outweigh customers' need for rate stability, particularly at a time when many customers are facing severe social and economic hardship.

Q. HAS THE COMPANY PROPOSED A LIMIT ON THE RNA MONTHLY ADJUSTMENT FACTOR APPLIED TO CUSTOMER BILLS?

A. Yes. WGL has proposed a $0.05 per therm monthly adjustment limit.

Q. WHAT IS WGL'S RATIONALE FOR THE $0.05 PER THERM RNA ADJUSTMENT LIMIT?

A. WGL answers this question in a couple of different ways. First, WGL says the proposed RNA adjustment limit is identical to the adjustment limit in its Maryland RNA, which was negotiated in a case settlement.[12] Second, witness Raab says the following regarding the RNA adjustment limit:[13]

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[11] WGL acknowledges that the RNA will help stabilize annual—not monthly—customer bills. *See Id*. at WGL Response to AOBA DR 5-14 and 5-15.

[12] *See Id*. at WGL Response to OPC DR 3-56a.

[13] See *Id*. at WGL Response to AOBA DR 5-16a.

> The cap level selected is simply a judgment that attempts to fairly balance the Company's need to collect its costs to serve customers with a desire to limit monthly volatility in customer bills. In this regard, the $0.05/therm rate cap seems a reasonable compromise, as it appears to reasonably accomplish these competing goals as a part of the Maryland RNA.

Q. IF THE COMMISSION APPROVES THE RNA, SHOULD THE $0.05 PER THERM LIMIT BE ADOPTED?

A. While I agree that there should be an adjustment limit if the Commission approves the RNA, the Commission should not adopt the $0.05 per therm adjustment limit proposed by WGL. The selection of a monthly adjustment limit seems to be more of a judgment call rather than a matter of analysis. As WGL noted, the $0.05 adjustment limit adopted in Maryland arose out of a negotiated settlement among parties in a rate case. If the Commission approves WGL's RNA in this case, I recommend that the monthly adjustment limit be set at $0.03 per therm. The lower limit would dampen potential RNA-related customer bill impacts and would at least reduce the possibility of unintended negative consequences to ratepayers from the RNA mechanism. If the lower limit causes an unacceptable buildup of accumulated RNA balances, the Commission can always revisit the issue in a future proceeding.

Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?

A. Yes.

QUALIFICATIONS OF
DENNIS W. GOINS

PRESENT POSITION

Economic Consultant, Potomac Management Group, Alexandria, VA

PREVIOUS POSITIONS

- Vice President, Hagler, Bailly & Company, Washington, DC
- Principal, Resource Consulting Group, Inc., Cambridge, MA
- Senior Associate, Resource Planning Associates, Inc., Cambridge, MA
- Economist, North Carolina Utilities Commission, Raleigh, NC

EDUCATION

College	Major	Degree
Wake Forest University	Economics	BA
North Carolina State University	Economics	ME
North Carolina State University	Economics	PhD

RELEVANT EXPERIENCE

Dr. Goins specializes in pricing, planning, and market structure issues affecting firms that buy and sell products in electricity and natural gas markets. He has extensive experience in developing product pricing strategies, setting rates for energy-related products and services, negotiating power supply and natural gas contracts for private and public entities, evaluating competitive market conditions, and analyzing power and fuel requirements, prices, market operations, and transactions. He has participated in more than 200 cases as an expert on cost of service, rate design, competitive market issues, utility restructuring, power market planning and operations, utility mergers, and management prudence before the Federal Energy Regulatory Commission, the General Accounting Office (now the Government Accountability Office), the First Judicial District Court of Montana, the Circuit Court of Kanawha County, West Virginia, the Linn County District Court of Iowa, and regulatory commissions in Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Missouri, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Texas, Utah, Vermont, Virginia, West Virginia, Wyoming, and the

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District of Columbia. He has also prepared an expert report on behalf of the United States regarding electricity pricing and contract issues in a case before the United States Court of Federal Claims.

PARTICIPATION IN REGULATORY, ADMINISTRATIVE, AND COURT PROCEEDINGS

1. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1156 (2019), on behalf of the General Services Administration, re cost of service, retail rate design, and alternative forms of regulation.
2. AltaGas Ltd., *et al*., before the Maryland Public Service Commission, Case No. 9449 (2018), on behalf of the Department of Defense and all other Federal Executive Agencies, re Settlement Agreement in merger of AltaGas and WGL Holdings, Inc.
3. AltaGas Ltd., *et al*., before the District of Columbia Public Service Commission, Formal Case No. 1142 (2017), on behalf of the Department of Defense and all other Federal Executive Agencies, re merger of AltaGas and WGL Holdings, Inc.
4. Kentucky Utilities, Inc., before the Kentucky Public Service Commission, Case No. 2016-00370 (2017), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
5. Louisville Gas and Electric Company, Inc., before the Kentucky Public Service Commission, Case No. 2016-00371 (2017), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
6. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1139 (2016), on behalf of the General Services Administration, re cost of service and retail rate design.
7. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 532 (2016), on behalf of Nucor Steel-Hertford, re cost of service and retail rate design.
8. Washington Gas Light Company, before the District of Columbia Public Service Commission, Formal Case No. 1137 (2016), on behalf of the General Services Administration, re cost of service and retail rate design.
9. Baltimore Gas and Electric Company, before the Maryland Public Service Commission, Case No. 9406 (2016), on behalf of the Department of Defense and all other Federal Executive Agencies, re Baltimore City conduit tax and retail rate design.

10. PECO Energy Company, before the Pennsylvania Public Utility Commission, Docket No. R-2015-2468981 (2015), on behalf of the General Services Administration, re retail distribution standby electric service.
11. Consolidated Edison of New York, Inc., before the New York Public Service Commission, Case No. 15-E-0050 (2015), on behalf of the General Services Administration, re retail delivery service cost recovery.
12. PJM Interconnection, LLC, before the Federal Energy Regulatory Commission, Docket No. ER15-623-000 (2015), on behalf of the Department of Defense/Federal Executive Agencies, re RPM market design and capacity performance resources.
13. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 14-1297-EL-SSO, (2014), on behalf of Nucor Steel Marion, Inc., re standard service offer and demand response.
14. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1121 (2014), on behalf of the General Services Administration, re infrastructure cost allocation and surcharge design.
15. Consolidated Edison of New York, Inc., *et al*., before the New York Public Service Commission, Case No. 14-M-0101 (2014), on behalf of the General Services Administration, re *Reforming the Energy Vision* issues.
16. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1116 (2014), on behalf of the General Services Administration, re infrastructure cost allocation and surcharge design.
17. Potomac Electric Power Company *et al.*, before the Maryland Public Service Commission, Case No. 9361 (2014), on behalf of the General Services Administration, re Exelon-PHI merger issues.
18. Potomac Electric Power Company *et al*., before the District of Columbia Public Service Commission, Formal Case No. 1119 (2014), on behalf of the General Services Administration, re Exelon-PHI merger issues.
19. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1114 *et al*. (2014), on behalf of the General Services Administration, re retail dynamic pricing.
20. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 41791 (2013), on behalf of Texas Cities, re cost of service and retail rate design.
21. Entergy Gulf States Louisiana, before the Louisiana Public Service Commission, Docket No. U-32707 (2013), on behalf of the Department of Energy, re retail cost recovery.

22. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 40979 (2013), on behalf of Texas Cities, re analysis of JSP PPA termination.
23. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1103 (2013), on behalf of the General Services Administration, re retail delivery service cost recovery.
24. Consolidated Edison of New York, Inc., before the New York Public Service Commission, Case No. 13-E-0030 (2013), on behalf of the General Services Administration, re retail delivery service cost recovery.
25. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 11-5201-EL-RDR *et al*., (2013), on behalf of the Ohio Energy Group and Nucor Steel Marion, Inc., re alternative energy rider.
26. Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 9311 (2013), on behalf of the General Services Administration, re retail cost recovery.
27. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 12-2190-EL-POR *et al*., (2012), on behalf of the Ohio Energy Group and Nucor Steel Marion, Inc., re energy efficiency and peak demand reduction portfolios.
28. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 485 (2012), on behalf of Nucor Steel-Hertford, re fuel rate adjustment.
29. Kentucky Utilities, Inc., before the Kentucky Public Service Commission, Case No. 2012-00221 (2012), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
30. Louisville Gas and Electric Company, Inc., before the Kentucky Public Service Commission, Case No. 2012-00222 (2012), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
31. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 479 (2012), on behalf of Nucor Steel-Hertford, re cost of service and retail rate design.
32. Kansas City Power & Light Company, before the Missouri Public Service Commission, Case No. ER-2012-0174 (2012), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
33. Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 9286 (2012), on behalf of the General Services Administration, re retail cost recovery.

34. Indiana Michigan Power Company, before the Indiana Utility Regulatory Commission, Cause No. 44075 (2012), on behalf of Steel Dynamics, Inc., re retail cost-of-service and fuel and purchased power cost recovery.
35. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 39896 (2012), on behalf of Texas Cities, re cost of service and retail rate design.
36. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1087 (2012), on behalf of the General Services Administration, re retail cost recovery.
37. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 474 (2011), on behalf of Nucor Steel-Hertford, re fuel rate adjustments.
38. Mid-Kansas Electric Company, before the Kansas Corporation Commission, Docket No. 11-GIME-597-GIE (2011), on behalf of Kansas Electric Power Cooperative, Inc., re local delivery service and operating agreements.
39. Duke Energy Corporation *et al*., before the Federal Energy Regulatory Commission, Docket No. EC11-60-000 (2011), on behalf of the North Carolina Electric Membership Corporation, re merger-related market power issues.
40. Resale Power Group of Iowa *et al*., before the Linn County District Court of Iowa, Case No. LACV 054271 (2011), on behalf of Central Iowa Power Cooperative, re compensation for unauthorized transmission access.
41. Columbus Southern Power Company *et al*., before the Public Utilities Commission of Ohio, Case No. 11-346-EL-SSO *et al*., (2011), on behalf of the OMA Energy Group., re standard service offer electric security plan rate design issues.
42. Appalachian Power Company and Wheeling Power Company, dba American Electric Power, before the Public Service Commission of West Virginia, Case No. 11-0274-E-GI (2011), on behalf of Steel of West Virginia, Inc., re expanded net energy cost rate issues.
43. Rocky Mountain Power Company, before the Wyoming Public Service Commission, Docket No. 20000-384-ER-10 (2011), on behalf of Cimarex Energy Company, QEP Field Services Company, and Kinder Morgan Interstate Gas Transmission, re utility rates, cost-of-service, and resource acquisition issues.
44. Duke Energy Indiana, Inc., before the Indiana Utility Regulatory Commission, Cause No. 43955 (2011), on behalf of Nucor Steel and Steel Dynamics, Inc., re utility-sponsored energy efficiency programs.

45. Kansas City Power & Light Company, before the Missouri Public Service Commission, Case No. ER-2010-0355 (2010), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
46. Appalachian Power Company and Wheeling Power Company, dba American Electric Power, before the Public Service Commission of West Virginia, Case No. 10-0699-E-42T (2010), on behalf of Steel of West Virginia, Inc., re cost-of-service and rate design issues.
47. Entergy Arkansas, Inc., before the Arkansas Public Service Commission, Docket No. 10-010-U (2010), on behalf of Arkansas Electric Energy Consumers, Inc., re industrial opt out of utility-sponsored energy efficiency programs.
48. Indiana Michigan Power Company, before the Indiana Utility Regulatory Commission, Cause No. 38702 – FAC 62-S1 (2010), on behalf of Steel Dynamics, Inc., re fuel and purchased power cost recovery.
49. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 459 (2010), on behalf of Nucor Steel-Hertford, re cost of service and retail rate design.
50. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 461 (2010), on behalf of Nucor Steel-Hertford, re fuel rate adjustments.
51. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 37744 (2010), on behalf of Texas Cities, re cost of service and retail rate design.
52. Kentucky Utilities, Inc., before the Kentucky Public Service Commission, Case No. 2009-00548 (2010), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
53. Louisville Gas and Electric Company, Inc., before the Kentucky Public Service Commission, Case No. 2009-00549 (2010), on behalf of the Kentucky Industrial Utility Customers, re interruptible rates.
54. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 09-1948-EL-POR *et al*., (2010), on behalf of Nucor Steel Marion, Inc., re energy efficiency and peak demand reduction portfolios.
55. Kauai Island Utility Cooperative, before the Hawaii Public Utilities Commission, Docket No. 2009-0050 (2010), on behalf of Kauai Marriott Resort & Beach Club, re retail cost allocation and rate design issues.
56. Entergy Arkansas, Inc., before the Arkansas Public Service Commission, Docket No. 09-024-U (2009), on behalf of Arkansas Electric Energy Consumers, Inc., re power plant environmental retrofit.

57. Appalachian Power Company, before the Virginia State Corporation Commission, Case No. PUE-2009-00030 (2009), on behalf of Steel Dynamics, Inc., re retail cost allocation and rate design issues.
58. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 09-906-EL-SSO (2009), on behalf of Nucor Steel Marion, Inc., re market rate offer.
59. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 456 (2009), on behalf of Nucor Steel-Hertford, re fuel cost adjustment.
60. Appalachian Power Company, before the Virginia State Corporation Commission, Case No. PUE-2009-00068 (2009), on behalf of Steel Dynamics, Inc., re demand response programs.
61. Indiana Michigan Power Company, before the Indiana Utility Regulatory Commission, Cause No. 43750 (2009), on behalf of Steel Dynamics, Inc., re wind power purchased power agreement.
62. Entergy Arkansas, Inc., before the Arkansas Public Service Commission, Docket No. 07-085-TF (2009), on behalf of Arkansas Electric Energy Consumers, Inc., re energy efficiency cost recovery.
63. CenterPoint Energy Arkansas Gas, before the Arkansas Public Service Commission, Docket No. 07-081-TF (2009), on behalf of Arkansas Gas Consumers, Inc., re energy efficiency cost recovery.
64. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2009-261-E (2009), on behalf of CMC Steel-SC, re DSM cost recovery surcharge.
65. Duke Energy Indiana, Inc., before the Indiana Utility Regulatory Commission, Cause No. 38707 FAC81 (2009), on behalf of Steel Dynamics, Inc., re fuel and purchased power cost recovery.
66. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1076 (2009), on behalf of the General Services Administration, re retail cost allocation and standby rate design issues for distributed generation resources.
67. Appalachian Power Company, before the Virginia State Corporation Commission, Case No. PUE-2009-00039 (2009), on behalf of Steel Dynamics, Inc., re environmental and reliability cost recovery.
68. Indiana Michigan Power Company, before the Indiana Utility Regulatory Commission, Cause No. 38702 – FAC 63 (2009), on behalf of Steel Dynamics, Inc., re fuel and purchased power cost recovery.

69. Appalachian Power Company, before the Virginia State Corporation Commission, Case No. PUE-2009-302-00038 (2009), on behalf of Steel Dynamics, Inc., re fuel and purchased power cost recovery.
70. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2008-302-E (2008), on behalf of CMC Steel-SC, re fuel and purchased power cost recovery.
71. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2008-196-E (2008), on behalf of CMC Steel-SC, re base load review order for a nuclear facility.
72. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 08-935-EL-SSO *et al*. (2008), on behalf of Nucor Steel Marion, Inc., re standard service offer via an electric security plan.
73. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 08-936-EL-SSO (2008), on behalf of Nucor Steel Marion, Inc., re market rate offer via a competitive bidding process.
74. Alabama Power Company, before the Alabama Public Service Commission, Docket No. 18148 (2008), on behalf of CMC Steel Alabama, Nucor Steel Birmingham, Inc., and Nucor Steel Tuscaloosa, Inc., re energy cost recovery.
75. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 35269 (2008), on behalf of Texas Cities, re jurisdictional allocation of system agreement payments.
76. Duke Energy Indiana, Inc., before the Indiana Utility Regulatory Commission, Cause No. 43374 (2008), on behalf of Nucor Steel and Steel Dynamics, Inc., re alternative regulatory plan.
77. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 34800 (2008), on behalf of Texas Cities, re affiliate transactions.
78. Commonwealth Edison Company, before the Illinois Commerce Commission, Docket No. 07-0566 (2008), on behalf of Nucor Steel Kankakee, Inc., re cost-of-service and rate design issues.
79. Ohio Edison *et al*., before the Public Utilities Commission of Ohio, Case No. 07-0551-EL-AIR *et al*. (2008), on behalf of Nucor Steel Marion, Inc., re cost-of-service and rate design issues.
80. Appalachian Power Company dba American Electric Power, before the Public Service Commission of West Virginia, Case No. 06-0033-E-CN (2007), on behalf of Steel of West Virginia, Inc., re power plant cost recovery mechanism.

81. Oncor Electric Delivery Company and Texas Energy Future Holdings Limited Partnership, before the Public Utilities Commission of Texas, PUC Docket No. 34077 (2007), on behalf of Nucor Steel - Texas, re acquisition of TXU Corp. by Texas Energy Future Holdings Limited Partnership.
82. Arkansas Oklahoma Gas Company, before the Arkansas Public Service Commission, Docket No. 07-026-U (2007), on behalf of West Central Arkansas Gas Consumers, re gas cost-of-service and rate design issues.
83. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-07-08 (2007), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
84. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1056 (2007), on behalf of the General Services Administration, re demand-side management and advanced metering programs.
85. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2007-229-E (2007), on behalf of CMC Steel-SC, re cost-of-service and rate design issues.
86. Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 9092 (2007), on behalf of the General Services Administration, re retail cost allocation and standby rate design issues for distributed generation resources.
87. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1053 (2007), on behalf of the General Services Administration, re retail cost allocation and standby rate design issues for distributed generation resources.
88. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 32907 (2006), on behalf of Texas Cities, re hurricane cost recovery.
89. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 32710/ SOAH Docket No. 473-06-2307 (2006), on behalf of Texas Cities, re reconciliation of fuel and purchased power costs.
90. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 060001-EI (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re fuel and purchased power cost recovery.
91. Arizona Public Service Company, before the Arizona Corporation Commission, Docket No. E-01345A-05-0816 (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re retail cost allocation and rate design issues.

92. PacifiCorp (dba Rocky Mountain Power), before the Utah Public Service Commission, Docket No. 06-035-21 (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re rate design issues.
93. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2006-2-E (2006), on behalf of CMC Steel-SC, re fuel and purchased power cost recovery.
94. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31544/ SOAH Docket No. 473-06-0092 (2006), on behalf of Texas Cities, re transition to competition rider.
95. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-05-28 (2006), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
96. Alabama Power Company, before the Alabama Public Service Commission, Docket No. 18148 (2005), on behalf of SMI Steel-Alabama, re energy cost recovery.
97. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050001-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re fuel and capacity cost recovery.
98. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31315/ SOAH Docket No. 473-05-8446 (2005), on behalf of Texas Cities, re incremental purchased capacity cost rider.
99. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050045-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.
100. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 05-042-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re power plant purchase.
101. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 04-141-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re cost-of-service and rate design issues.
102. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 412 (2005), on behalf of Nucor Steel-Hertford, re cost-of-service and interruptible rate issues.
103. Public Service Company of Colorado, before the Colorado Public Utilities Commission, Docket No. 04S-164E (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.

104. CenterPoint Energy Houston Electric, LLC, *et al*., before the Public Utility Commission of Texas, PUC Docket No. 29526 (2004), on behalf of the Coalition of Commercial Ratepayers, re stranded cost true-up balances.

105. PacifiCorp, before the Utah Public Service Commission, Docket No. 04-035-11 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re time-of-day rate design issues.

106. Arizona Public Service Company, before the Arizona Corporation Commission, Docket No. E-01345A-03-0347 (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re retail cost allocation and rate design issues.

107. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-03-13 (2004), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re retail cost allocation and rate design issues.

108. PacifiCorp, before the Utah Public Service Commission, Docket No. 03-2035-02 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re retail cost allocation and rate design issues.

109. Dominion Virginia Power, before the Virginia State Corporation Commission, Case No. PUE-2000-00285 (2003), on behalf of Chaparral (Virginia) Inc., re recovery of fuel costs.

110. Jersey Central Power & Light Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02080506, OAL Docket No. PUC-7894-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.

111. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02050303, OAL Docket No. PUC-5744-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.

112. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2002-223-E (2002), on behalf of SMI Steel-SC, re retail cost allocation and rate design issues.

113. Montana Power Company, before the First Judicial District Court of Montana, *Great Falls Tribune et al. v. the Montana Public Service Commission*, Cause No. CDV2001-208 (2002), on behalf of a media consortium (*Great Falls Tribun*e, *Billings Gazett*e, *Montana Standar*d, *Helena Independent Recor*d, *Missoulia*n, Big Sky Publishing, Inc. dba *Bozeman Daily Chronicl*e, the Montana Newspaper Association, *Miles City Sta*r, *Livingston Enterpris*e, Yellowstone Public Radio, the Associated Press, Inc., and the Montana Broadcasters Association), re public disclosure of allegedly proprietary contract information.

114. Louisville Gas & Electric *et al.*, before the Kentucky Public Service Commission, Administrative Case No. 387 (2001), on behalf of Gallatin Steel Company, re adequacy of generation and transmission capacity in Kentucky.
115. PacifiCorp, before the Utah Public Service Commission, Docket No. 01-035-01 (2001), on behalf of Nucor Steel, re retail cost allocation and rate design issues.
116. TXU Electric Company, before the Public Utilities Commission of Texas, PUC Docket No. 23640/ SOAH Docket No. 473-01-1922 (2001), on behalf of Nucor Steel, re fuel cost recovery.
117. FPL Group *et al.*, before the Federal Energy Regulatory Commission, Docket No. EC01-33-000 (2001), on behalf of Arkansas Electric Cooperative Corporation, Inc., re merger-related market power issues.
118. Entergy Mississippi, Inc., *et al.*, before the Mississippi Public Service Commission, Docket No. 2000-UA-925 (2001), on behalf of Birmingham Steel-Mississippi, re appropriate regulatory conditions for merger approval.
119. TXU Electric Company, before the Public Utilities Commission of Texas, PUC Docket No. 22350/ SOAH Docket No. 473-00-1015 (2000), on behalf of Nucor Steel, re unbundled cost of service and rates.
120. PacifiCorp, before the Utah Public Service Commission, Docket No. 99-035-10 (2000), on behalf of Nucor Steel, re using system benefit charges to fund demand-side resource investments.
121. Entergy Arkansas, Inc. *et al.*, before the Arkansas Public Service Commission, Docket No. 00-190-U (2000), on behalf of Nucor-Yamato Steel and Nucor Steel-Arkansas, re the development of competitive electric power markets in Arkansas.
122. Entergy Arkansas, Inc. *et al.*, before the Arkansas Public Service Commission, Docket No. 00-048-R (2000), on behalf of Nucor-Yamato Steel and Nucor Steel-Arkansas, re generic filing requirements and guidelines for market power analyses.
123. ScottishPower and PacifiCorp, before the Utah Public Service Commission, Docket No. 98-2035-04 (1999), on behalf of Nucor Steel, re merger conditions to protect the public interest.
124. Dominion Resources, Inc. and Consolidated Natural Gas Company, before the Virginia State Corporation Commission, Case No. PUA990020 (1999), on behalf of the City of Richmond, re market power and merger conditions to protect the public interest.
125. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 18465 (1998) on behalf of the Texas Commercial Customers, re excess earnings and stranded-cost recovery and mitigation.

126. PJM Interconnection, LLC, before the Federal Energy Regulatory Commission, Docket No. ER98-1384 (1998) on behalf of Wellsboro Electric Company, re pricing low-voltage distribution services.
127. DQE, Inc. and Allegheny Power System, Inc., before the Federal Energy Regulatory Commission, Docket Nos. ER97-4050-000, ER97-4051-000, and EC97-46-000 (1997) on behalf of the Borough of Chambersburg, re market power in relevant markets.
128. GPU Energy, before the New Jersey Board of Public Utilities, Docket No. EO97070458 (1997) on behalf of the New Jersey Commercial Users Group, re unbundled retail rates.
129. GPU Energy, before the New Jersey Board of Public Utilities, Docket No. EO97070459 (1997) on behalf of the New Jersey Commercial Users Group, re stranded costs.
130. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, Docket No. EO97070461 (1997) on behalf of the New Jersey Commercial Users Group, re unbundled retail rates.
131. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, Docket No. EO97070462 (1997) on behalf of the New Jersey Commercial Users Group, re stranded costs.
132. DQE, Inc. and Allegheny Power System, Inc., before the Federal Energy Regulatory Commission, Docket Nos. ER97-4050-000, ER97-4051-000, and EC97-46-000 (1997) on behalf of the Borough of Chambersburg, Allegheny Electric Cooperative, Inc., and Selected Municipalities, re market power in relevant markets.
133. CSW Power Marketing, Inc., before the Federal Energy Regulatory Commission, Docket No.ER97-1238-000 (1997) on behalf of the Transmission Dependent Utility Systems, re market power in relevant markets.
134. Central Hudson Gas & Electric Corporation *et al.*, before the New York Public Service Commission, Case Nos. 96-E-0891, 96-E-0897, 96-E-0898, 96-E-0900, 96-E-0909 (1997), on behalf of the Retail Council of New York, re stranded-cost recovery.
135. Central Hudson Gas & Electric Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0909 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
136. Consolidated Edison Company of New York, Inc., supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0897 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.

137. New York State Electric & Gas Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0891 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
138. Rochester Gas and Electric Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0898 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
139. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 15015 (1996), on behalf of Nucor Steel-Texas, re real-time electricity pricing.
140. Central Power and Light Company, before the Public Utility Commission of Texas, Docket No. 14965 (1996), on behalf of the Texas Retailers Association, re cost of service and rate design.
141. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 95-1076-E (1996), on behalf of Nucor Steel-Darlington, re integrated resource planning.
142. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 13575 (1995), on behalf of Nucor Steel-Texas, re integrated resource planning, DSM options, and real-time pricing.
143. Arkansas Power & Light Company, *et al*., Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Initial Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
144. Arkansas Power & Light Company, *et al*., Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Reply Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
145. Arkansas Power & Light Company, *et al*., Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Final Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
146. South Carolina Pipeline Corporation, before the South Carolina Public Service Commission, Docket No. 94-202-G (1995), on behalf of Nucor Steel, re integrated resource planning and rate caps.

147. Gulf States Utilities Company, before the United States Court of Federal Claims, *Gulf States Utilities Company v. the United States*, Docket No. 91-1118C (1994, 1995), on behalf of the United States, re electricity rate and contract dispute litigation.
148. American Electric Power Corporation, before the Federal Energy Regulatory Commission, Docket No. ER93-540-000 (1994), on behalf of DC Tie, Inc., re costing and pricing electricity transmission services.
149. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 13100 (1994), on behalf of Nucor Steel-Texas, re real-time electricity pricing.
150. Carolina Power & Light Company, *et al*., Proposed Regulation Governing the Recovery of Fuel Costs by Electric Utilities, before the South Carolina Public Service Commission, Docket No. 93-238-E (1994), on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
151. Southern Natural Gas Company, before the Federal Energy Regulatory Commission, Docket No. RP93-15-000 (1993-1995), on behalf of Nucor Steel-Darlington, re costing and pricing natural gas transportation services.
152. West Penn Power Company, *et al*., v. State Tax Department of West Virginia, *et al*., Civil Action No. 89-C-3056 (1993), before the Circuit Court of Kanawha County, West Virginia, on behalf of the West Virginia Department of Tax and Revenue, re electricity generation tax.
153. Carolina Power & Light Company, *et al*., Proceeding Regarding Consideration of Certain Standards Pertaining to Wholesale Power Purchases Pursuant to Section 712 of the 1992 Energy Policy Act, before the South Carolina Public Service Commission, Docket No. 92-231-E (1993), on behalf of Nucor Steel-Darlington, re Section 712 regulations.
154. Mountain Fuel Supply Company, before the Public Service Commission of Utah, Docket No. 93-057-01 (1993), on behalf of Nucor Steel-Utah, re costing and pricing retail natural gas firm, interruptible, and transportation services.
155. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 11735 (1993), on behalf of the Texas Retailers Association, re retail cost-of-service and rate design.
156. Virginia Electric and Power Company, before the Virginia State Corporation Commission, Case No. PUE920041 (1993), on behalf of Philip Morris USA, re cost of service and retail rate design.
157. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 92-209-E (1992), on behalf of Nucor Steel-Darlington.

158. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Rate Design (1992), on behalf of the Department of Energy, Strategic Petroleum Reserve.
159. Georgia Power Company, before the Georgia Public Service Commission, Docket Nos. 4091-U and 4146-U (1992), on behalf of Amicalola Electric Membership Corporation.
160. PacifiCorp, Inc., before the Federal Energy Regulatory Commission, Docket No. EC88-2-007 (1992), on behalf of Nucor Steel-Utah.
161. South Carolina Pipeline Corporation, before the South Carolina Public Service Commission, Docket No. 90-452-G (1991), on behalf of Nucor Steel-Darlington.
162. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 91-4-E, 1991 Fall Hearing, on behalf of Nucor Steel-Darlington.
163. Sonat, Inc., and North Carolina Natural Gas Corporation, before the North Carolina Utilities Commission, Docket No. G-21, Sub 291 (1991), on behalf of Nucor Corporation, Inc.
164. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E002/GR-91-001 (1991), on behalf of North Star Steel-Minnesota.
165. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase IV-Rate Design (1991), on behalf of the Department of Energy, Strategic Petroleum Reserve.
166. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 9850 (1990), on behalf of the Department of Energy, Strategic Petroleum Reserve.
167. General Services Administration, before the United States General Accounting Office, Contract Award Protest (1990), Solicitation No. GS-00P-AC87-91, Contract No. GS-00D-89-B5D-0032, on behalf of Satilla Rural Electric Membership Corporation, re cost of service and rate design.
168. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 90-4-E (1990 Fall Hearing), on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
169. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Rate Design (1990), on behalf of the Department of Energy, Strategic Petroleum Reserve, re cost of service and rate design.

170. Atlanta Gas Light Company, before the Georgia Public Service Commission, Docket No. 3923-U (1990), on behalf of Herbert G. Burris and Oglethorpe Power Corporation, re anticompetitive pricing schemes.
171. Ohio Edison Company, before the Ohio Public Utilities Commission, Case No. 89-1001-EL-AIR (1990), on behalf of North Star Steel-Ohio, re cost of service and rate design.
172. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Cost of Service/Revenue Spread (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
173. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E002/GR-89-865 (1989), on behalf of North Star Steel-Minnesota.
174. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Rate Design (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
175. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 89-039-10 (1989), on behalf of Nucor Steel-Utah and Vulcraft, a division of Nucor Steel.
176. Soyland Power Cooperative, Inc. v. Central Illinois Public Service Company, Docket No. EL89-30-000 (1989), before the Federal Energy Regulatory Commission, on behalf of Soyland Power Cooperative, Inc., re wholesale contract pricing provisions
177. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket No. 8702 (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
178. Houston Lighting and Power Company, before the Public Utility Commission of Texas, Docket No. 8425 (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
179. Northern Illinois Gas Company, before the Illinois Commerce Commission, Docket No. 88-0277 (1989), on behalf of the Coalition for Fair and Equitable Transportation, re retail gas transportation rates.
180. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 79-7-E, 1988 Fall Hearing, on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
181. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 869 (1988), on behalf of Peoples Drug Stores, Inc., re cost of service and rate design.

182. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 88-11-E (1988), on behalf of Nucor Steel-Darlington.

183. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E-002/GR-87-670 (1988), on behalf of the Metalcasters of Minnesota.

184. Ohio Edison Company, before the Ohio Public Utilities Commission, Case No. 87-689-EL-AIR (1987), on behalf of North Star Steel-Ohio.

185. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 87-7-E (1987), on behalf of Nucor Steel-Darlington.

186. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase I (1987), on behalf of the Strategic Petroleum Reserve.

187. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket No. 7195 (1987), on behalf of the Strategic Petroleum Reserve.

188. Gulf States Utilities Company, before the Federal Energy Regulatory Commission, Docket No. ER86-558-006 (1987), on behalf of Sam Rayburn G&T Cooperative.

189. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 85-035-06 (1986), on behalf of the U.S. Air Force.

190. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 6765 (1986), on behalf of the Strategic Petroleum Reserve.

191. Central Maine Power Company, before the Maine Public Utilities Commission, Docket No. 85-212 (1986), on behalf of the U.S. Air Force.

192. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket Nos. 6477 and 6525 (1985), on behalf of North Star Steel-Texas.

193. Ohio Edison Company, before the Ohio Public Utilities Commission, Docket No. 84-1359-EL-AIR (1985), on behalf of North Star Steel-Ohio.

194. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 84-035-01 (1985), on behalf of the U.S. Air Force.

195. Central Vermont Public Service Corporation, before the Vermont Public Service Board, Docket No. 4782 (1984), on behalf of Central Vermont Public Service Corporation.

196. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-15641 (1983), on behalf of the Strategic Petroleum Reserve.
197. Southwestern Power Administration, before the Federal Energy Regulatory Commission, Rate Order SWPA-9 (1982), on behalf of the Department of Defense.
198. Public Service Company of Oklahoma, before the Federal Energy Regulatory Commission, Docket Nos. ER82-80-000 and ER82-389-000 (1982), on behalf of the Department of Defense.
199. Central Maine Power Company, before the Maine Public Utilities Commission, Docket No. 80-66 (1981), on behalf of the Commission Staff.
200. Bangor Hydro-Electric Company, before the Maine Public Utilities Commission, Docket No. 80-108 (1981), on behalf of the Commission Staff.
201. Oklahoma Gas & Electric, before the Oklahoma Corporation Commission, Docket No. 27275 (1981), on behalf of the Commission Staff.
202. Green Mountain Power, before the Vermont Public Service Board, Docket No. 4418 (1980), on behalf of the PSB Staff.
203. Williams Pipe Line, before the Federal Energy Regulatory Commission, Docket No. OR79-1 (1979), on behalf of Mapco, Inc.
204. Boston Edison Company, before the Massachusetts Department of Public Utilities, Docket No. 19494 (1978), on behalf of Boston Edison Company.
205. Duke Power Company, before the North Carolina Utilities Commission, Docket No. E-7, Sub 173, on behalf of the Commission Staff.
206. Duke Power Company, before the North Carolina Utilities Commission, Docket No. E-100, Sub 32, on behalf of the Commission Staff.
207. Virginia Electric & Power Company, before the North Carolina Utilities Commission, Docket No. E-22, Sub 203, on behalf of the Commission Staff.
208. Virginia Electric & Power Company, before the North Carolina Utilities Commission, Docket No. E-22, Sub 170, on behalf of the Commission Staff.
209. Southern Bell Telephone Company, before the North Carolina Utilities Commission, Docket No. P-5, Sub 48, on behalf of the Commission Staff.
210. Western Carolina Telephone Company, before the North Carolina Utilities Commission, Docket No. P-58, Sub 93, on behalf of the Commission Staff.
211. Natural Gas Ratemaking, before the North Carolina Utilities Commission, Docket No. G-100, Sub 29, on behalf of the Commission Staff.

212. General Telephone Company of the Southeast, before the North Carolina Utilities Commission, Docket No. P-19, Sub 163, on behalf of the Commission Staff.
213. Carolina Power and Light Company, before the North Carolina Utilities Commission, Docket No. E-2, Sub 264, on behalf of the Commission Staff.
214. Carolina Power and Light Company, before the North Carolina Utilities Commission, Docket No. E-2, Sub 297, on behalf of the Commission Staff.
215. Duke Power Company, *et al*., Investigation of Peak-Load Pricing, before the North Carolina Utilities Commission, Docket No. E-100, Sub 21, on behalf of the Commission Staff.
216. Investigation of Intrastate Long Distance Rates, before the North Carolina Utilities Commission, Docket No. P-100, Sub 45, on behalf of the Commission Staff.

EXHIBIT GSA (A)-2

SELECTED DATA REQUEST RESPONSES

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PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1162

WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-7

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 17, lines 1-9, please:

a. Document and explain in greater detail the basis for Witness Raab's assessment that his estimate of 3,687.1 "*will overstate the likely HDD's in the rate effective period*;"

b. Provide the data, assumptions, models, and workpapers relied upon by the witness to conclude that his 3,687.1 HDD estimate is more appropriate for the rate effective period than:

1. An estimate based on a 30-year moving average;

2. An estimate based on a 10-year moving average;

3. A projection of OCN values for the rate effective period;

4. A HDD estimate for the rate effective period based on Hinge Fit Normals.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. Mr. Raab's analysis in this case clearly documents and quantifies a warming trend in the surface temperatures used to calculate "normal" weather. All available climate information points to the fact that this warming trend will continue. If so, the Company can expect to experience fewer HDDs than even those predicted by Mr. Raab's trend model for the test year.

b.

1. Please see the response to AOBA Data Request No. 5, Question No. 7(a).

2. Please see the response to AOBA Data Request No. 5, Question No. 7(a).

3. The Company is precluded from using OCN values for determining normal weather, based on the Commission's Order No. 17132 in Formal Case No. 1137, as fully described in Mr. Raab's testimony. As a result, the ARCH/GARCH approach is the most accurate determination of normal weather (as described in Mr. Raab's Direct Testimony) that both satisfies Commission Order No. 17132 and that also captures the heteroskedasticity and the obvious warming trend in weather exhibited by the data in the Washington Gas District of Columbia service territory.

4. The Company is precluded from using Hinge Fit Normal values for determining normal weather, based on the Commission's Order No. 17132 in Formal Case No. 1137, as fully described in Mr. Raab's testimony. As a result, the ARCH/GARCH approach is the most accurate determination of normal weather (as described in Mr. Raab's Direct Testimony) that both satisfies Commission Order No. 17132 and that also captures the heteroskedasticity and the obvious warming trend in weather exhibited by the data in the Washington Gas District of Columbia service territory.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-8

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 17, line 20, through page 18, line 13. The Commission has traditionally only approved annual revenue requirements by rate class for Washington Gas, in that context, please:

a. Provide that analyses upon which the Company intends to rely to establish the monthly billing determinants and monthly revenue requirement upon which **monthly** revenue per customer amounts will be computed;

b. Explain why the use of average revenue per customer for each class for each month is appropriate for classes that have considerable diversity in usage characteristics.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. The analyses upon which the Company relies to establish the monthly billing determinants and monthly revenue requirement upon which monthly revenue per customer amounts will be computed is described in the direct testimonies of Company witnesses Aaron Gibson and Andrew Lawson in this proceeding.

b. The use of average revenue per customer for each class for each month is appropriate for classes that (may or may not) have considerable diversity in usage characteristics because all customers within a class are billed under the same rates. In other words, the Company and the Commission have previously determined that whatever intra-class diversity may exist within a class is not enough reason to subdivide that class based on revenues collected or the cost to serve the class.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-9

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 17, line 20, through page 18, line 13, please:

a. Indicate where in the Company's Direct Testimony and Exhibits in this proceeding, the monthly billing determinants that the Company intends to use to compute average revenue per customer amounts for Commercial and Group Metered Apartments, including applicable demand billing determinants, have been presented;

b. Provide the assessments the witness and/or the Company have developed to assess the potential mismatches of incremental revenues, under a method that uses average revenue per customer for rate adjustment calculations, and the actual incremental revenues that the Company would expect if customers added (or lost) in any month for a non-residential class:

1. Have usage more than one standard deviation **below** the average use for the class;

2. Have usage more than one standard deviation **above** the average use for the class.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. Please see the Direct Testimony of Aaron Gibson filed in this proceeding.

b.

1. Commission-authorized incremental revenues, based on the costs and billing determinants that the Commission determines to be appropriate in this case, may differ from the actual incremental revenues that the Company would receive if the usage characteristics of customers added (or lost) in any month for a non-residential class differ from Commission-approved test year billing

determinants for those customers. But this fact does not indicate any "mismatch." The revenues of incremental customers will be adjusted (either up or down) to match the level of Commission-authorized costs to serve these customers. This is appropriate because, regardless of the volumes consumed, the costs to serve these customers remain fixed at the level determined to be appropriate by the Commission in this case. This same level of revenues will be collected under the Company's RNA.

2. Please see the response above to AOBA Data Request No. 5, Question No. 9(b)(1).

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-10

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 24, line 24, through page 25, line 3, please provide the data, analysis, assumptions, workpapers, studies and other documents upon which Witness Raab has relied to assess the extent to which volatility in customers' month-to-month bills has been experienced by customers in **each Maryland rate class** under the Company's RNA mechanism in Maryland.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. Witness Raab has made no such assessment for two reasons. First, the Company's primary objective in introducing an RNA is not necessarily to reduce volatility in customers' month-to-month bills. Rather, the objective is to collect the cost it incurs to serve customers on an annual basis which will in turn reduce volatility in customers' year-to-year bills. Second, it was not necessary to assess the volatility in customers' annual bills in each Maryland rate class under the Company's RNA mechanism in Maryland because Mr. Raab assesses the volatility in customers' annual bills in each District of Columbia rate class under the Company's proposed RNA mechanism in the District of Columbia. This assessment is documented in Mr. Raab's Exhibit WG (G)-6.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-11

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 25, lines 21-22, please:

a. Identify the criteria upon which Witness Raab relies to identify "*the **correct** price signal*" for each Washington Gas rate class in the District of Columbia;

b. Provide the data, analyses, assumptions, workpapers, studies, and other documents upon which Witness Raab relies to determine "*the **correct** price signal*" for each Washington Gas rate class in the District of Columbia;

c. Explain how monthly varying rate adjustments under the Company's proposed RNA mechanism would foster customer's understanding of the price signals the Company is trying to convey to its customers in the District of Columbia.

d. Explain how unpredictable monthly changes in RNA rate adjustments facilitate customers' efforts to make informed and economically efficient gas consumption decisions.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. The criterion upon which Witness Raab relies to identify "the correct price signal" for each Washington Gas rate class in the District of Columbia is "the widely accepted canon of fair pricing, the principle of service at cost." (see Bonbright, James C., Danielson, Albert L., & Kamerschen, David R., Principles of Public Utility Rates. Arlington, VA: Public Utilities Reports, Inc. (1988) at 397.)

b. Please see the Company's Class Cost of Service Study filed in this proceeding.

c. The monthly varying rate adjustments under the Company's proposed RNA mechanism correct the widely recognized cost incurrence/cost recovery problem for natural gas LDCs that rely on volumetric charges to collect fixed costs by adjusting lower than anticipated usage upward and higher than anticipated usage downward. When considered over an annual period, these adjustments indicate to customers that Washington Gas's costs to deliver natural gas to that customer do not vary by usage. The Company's proposed RNA is designed to foster that understanding among customers in the District of Columbia, just as it does in Maryland and Virginia. It seems appropriate to make these adjustments monthly so that significant cost and revenue imbalances do not build up over the year and require the imputation of carrying charges to appropriately reflect the "fixed" nature of the costs.

d. Customers make long term investments in natural gas using appliances and it is the investments in those appliances that directly lead to the usage of natural gas and a reliance on the Washington Gas distribution system to deliver the natural gas to power those appliances. A consumer decision to invest in natural gas using appliances is driven, among other things, by the anticipated long-term price of delivered natural gas. By reducing the short-term volatility in annual bills, which the RNA clearly does, customers' efforts to make informed and economically efficient gas consumption decisions are facilitated.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-12

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 26, lines 17-20, please explain how the Company's proposed RNA, which would apply rate adjustments on a volumetric basis, would qualify as a "*non-volumetric rate*."

WASHINGTON GAS'S RESPONSE 04/22/2020

A. The Company's proposed RNA, which would apply rate adjustments on a volumetric basis, qualifies as a "non-volumetric rate" because the Commission-authorized revenues upon which the rate adjustments are based are not dependent on volumes. Applying those rate adjustments to individual customers on a volumetric basis is simply an equitable way to allocate class revenue deficiencies or excesses to individual customers.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-13

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 27, lines 3-10, please:

a. Indicate whether Witness Raab would characterize the Company's proposed RNA mechanism as a "Rate Stabilization Tariff;"

b. Explain how the Company's proposed RNA would constitute a form of performance based ratemaking, and if so, identify the measures of utility performance it is intended to impact.

WASHINGTON GAS'S RESPONSE 04/22/2020

A.

a. No, Witness Raab would not characterize the Company's proposed RNA mechanism as a "Rate Stabilization Tariff."

b. The Company does not consider its proposed RNA mechanism to be a form of performance-based ratemaking.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-14

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 29, lines 1-2, please:

a. Provide the data, analyses, assumptions, workpapers, studies, and other documents upon which the witness relies to support his assertion that RNA mechanisms "*can provide customers with more stable and predictable bills*."

b. Using Witness Raab's understanding of historical weather variations for the Company's District of Columbia service territory and non-weather-related changes in gas use patterns by rate class, as well as the structure of the Company's proposed monthly RNA rate adjustment calculations, provide demonstration of the manner in which the proposed RNA rate adjustments would improve the predictability of bills for WG's firm service Commercial customers in the District.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. A demonstration that RNA mechanisms can provide customers with more stable and predictable bills is shown clearly on Exhibit WG (G)-5. Page 1 of the exhibit compares the volatility of experienced billing determinants by class over the period 2012-2019 to the billing determinants upon which rates were based over the same period. Page 2 of the exhibit compares the volatility of revenues (bills) by class for fiscal years 2014, 2015 and 2016 to Commission authorized revenues in Formal Case No. 1093 and revenues (bills) by class for fiscal years 2018 and 2019 to Commission authorized revenues in Formal Case No. 1137. The volatility of experienced bills and the degree to which they differ from the bills that customers could have expected as a result of these two base rate proceedings is also shown on the exhibit. An RNA mechanism such as that one proposed by the Company is this proceeding would reduce, if not eliminate, both the volatility of annual bills and the difference between actual customer bills and expected customer bills.

b. Please see the response to AOBA Data Request No. 5, Question No. 14(a).

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-15

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 29, line 11-20, please verify that if a warmer than normal December is followed by a colder than normal February, the RNA rate adjustment applicable to February usage would increase charges for customers during a period in which their usage would also be greater than average due to colder than normal weather.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. Mathematically, this is true. However, it is not the Company's primary intent to stabilize monthly bills, but annual bills.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-16

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 29, lines 21, through page 30, line 2, please:

a. Provide the workpapers, data, assumptions, studies and other documents upon which Witness Raab has relied to assess the reasonableness and appropriateness of the level of the rate cap that the Company proposes to use to limit monthly rate adjustments under its proposed RNA mechanism;

b. Provide citations to other utilities of which Witness Raab is aware that use a single fixed cents per therm amount to limit monthly RNA rate adjustments for all firm service rate classifications, and specify the rate caps that each cited utility employs.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. Witness Raab relied on no workpapers, data, studies or other documents to assess the reasonableness and appropriateness of the level of the \$.05/therm rate cap that the Company proposes to use to limit monthly rate adjustments under its proposed RNA mechanism. The cap level selected is simply a judgment that attempts to fairly balance the Company's need to collect its costs to serve customers with a desire to limit monthly volatility in customer bills. In this regard, the \$.05/therm rate cap seems a reasonable compromise, as it appears to reasonably accomplish these competing goals as a part of the Maryland RNA.

b. Witness Raab did not survey other utilities that use a single fixed cents per therm amount to limit monthly RNA rate adjustments, because Mr. Raab does not believe that the experience of other utilities in this regard is particularly relevant to Washington Gas customers. Far more relevant to Washington Gas is the experience of its own customers with an RNA cap and this information is available from Maryland, a contiguous service territory also served by Washington Gas.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 5

QUESTION NO. 5-17

Q. Re: the Direct Testimony of Witness Raab, Exhibit WG (G), at page 29, lines 21, through page 30, line 2, please provide Witness Raab's understanding of the manner in which the Company's proposal in this proceeding to increase the RES credit would impact the benefits that low income customers can expect to derive from the Company's proposed RNA mechanism.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. The statements made in the referenced Direct Testimony of Witness Raab are not dependent on the level of the RES credit.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-18

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 13, lines 6-21, please:

a. Verify that the methodology proposed for RNA credit/charge determinations presumes that customers added to the system in each rate class will have usage characteristics that are reasonably represented by the average monthly usage of existing customers in that class;

b. Provide the data, analyses, workpapers, studies and other documents upon which the Company has relied to assess the extent to which new customers added to a rate class have usage consistent with the average usage of existing customers within the same rate class.

c. For each firm service rate classification to which the proposed RNA mechanism would be applicable, provide:

   1. The mean therm use for each month of the test year;

   2. The standard deviation for therm use for customers in each rate class for each month of the test year.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. a. Yes

b. See the response to AOBA Data Request 5-8.

c. 1. The data necessary to perform this calculation is available to AOBA in Exhibit WG (E)-1.

   2. The Company did not perform this calculation.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-21

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 13, lines 6-21, please document and explain the manner in which the actual monthly number of customers used in the proposed RNA rate adjustment calculations would treat customers who are billed for more than one month's service in a single bill.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. The number of customers each month is based on the number of active meters, regardless of usage.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-22

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H)-3, line 10, on pages 2 of 4 through 4 of 4, please provide the workpapers, data, analyses, and assumption used to derive the "Test Year Average use per Customer" for each rate class.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. The average use per customer is simply the monthly normal weather therm usage divided by the number of active meters. The month of January 2020 was used for the sample calculations.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-23

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 14, lines 21-24, please provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company relies to support Witness Lawson's assertion that the Customer growth adjustment "*provides greater confidence that the resulting revenue benchmark is reflective of current conditions*."

WASHINGTON GAS'S RESPONSE 04/22/2020

A. Customers are added over time and additional costs are incurred to serve those customers, therefore additional revenue is needed to update the snapshot in time that target revenues decided in the Company's most recent base rate case represent.

The Customer Growth Adjustment proposed by the Company is consistent with that approved by the Commission for PEPCO's Bill Stabilization Adjustment ("BSA").

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-24

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 14, lines 21-24, please provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company has relied to assess the manner in which the proposed RNA would have performed **for each rate class** during past periods.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. Please see Exhibit WG (G)-5 attached to the Direct Testimony of Paul H. Raab

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-25

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 14, line 24, through page 25, line 3, please provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company has relied to assess the extent to which therm use by non-residential customers in the District of Columbia in future periods can be expected to deviate from average test year therm use for each class as a result of the requirements of the CleanEnergy DC Omnibus Amendment Act of 2018.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. The impacts of the CleanEnergy DC Omnibus Amendment Act of 2018 on gas usage are unclear at this time, and the Company has not projected an impact on non-residential therm usage as a result in this proceeding. Certainly, in the rate effective period for this case (2021), there will be little to no effect.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-26

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 15, lines 3-5, please provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company has relied to assess changes in the relationship between Peak Usage charge revenue per customer and average revenue per customer over time.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. Please see Exhibit WGL (H)-1, Schedule B.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 6

QUESTION NO. 6-27

Q. Re: the Direct Testimony of Witness Lawson, Exhibit WG (H), page 15, lines 6-12, please:

a. Provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company has relied to assess the appropriateness **for each rate class** of a $0.05 per therm cap on monthly RNA adjustments;

b. Provide the data, analyses, assumptions, workpapers, and other studies or documents upon which the Company has relied to assess the impacts on customer bills for customers in each rate class of the proposed $0.05 per therm cap on monthly RNA adjustments.

WASHINGTON GAS'S RESPONSE 04/22/2020

A. See the response to OPC Data Request No. 3-56.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-45

Q. **Energy Efficiency.** Please provide all empirical studies that estimate, calculate, or otherwise demonstrate that the promotion of energy efficiency and conservation programs, without decoupling, will compromise a regulated utility's (including the Company's) ability to earn a just and reasonable rate of return or compromise the ability to provide reliable service.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. It would be virtually impossible to provide all empirical studies that address this topic, as it has been recognized as a significant problem for decades and has been the subject of significant study. If OPC is interested in educating itself about this issue, the Company would suggest as a starting point the document "Aligning Utility Incentives with Investment in Energy Efficiency," published in 2007 by the National Action Plan for Energy Efficiency and available at https://www.epa.gov/sites/production/files/2015-08/documents/incentives.pdf. In its forward, that document states:

This report on Aligning Utility Incentives with Investment in Energy Efficiency is provided to assist gas and electric utilities, utility regulators, and others in the implementation of the recommendations of the National Action Plan for Energy Efficiency (Action Plan) and the pursuit of its longer-term goals.

The Report describes the financial effects on a utility of its spending on energy efficiency programs, how those effects could constitute barriers to more aggressive and sustained utility investment in energy efficiency, and how adoption of various policy mechanisms can reduce or eliminate these barriers.

Many other organizations, including, but not limited to, the National Association of Regulatory Utility Commissioners ("NARUC"), the National Resources Defense Counsel and the American Gas Association, have also addressed this issue. NARUC studied this issue and documented the results in a Briefing Paper by

Ken Costello of the National Regulatory Research Institute entitled "Revenue Decoupling for Natural Gas Utilities." That comprehensive evaluation notes the following positive features of revenue decoupling ("RD") mechanisms for natural gas utilities:

1. A small reduction in gas sales can affect significantly a utility's earnings.
2. Under standard ratemaking, energy efficiency initiatives harm utility shareholders between rate cases. The accumulation of earnings losses over the period between rate cases can be significant.
3. It is unfair to have a utility promote energy efficiency when it harms its shareholders, as the utility has a fiduciary responsibility to its shareholders in maximizing returns.
4. Rate cases, which impose significant costs on utilities and commissions, would become less frequent over time.
5. Standard ratemaking steers a utility away from initiating energy efficiency actions, some of which may be cost-effective; or, when forced to promote energy efficiency activities, utilities will do so lackadaisically. RD is therefore critical to assure that utilities effectively carry out energy efficiency initiatives.
6. A utility is entitled to a reasonable opportunity to recover fully its previously authorized fixed costs between rate filings, even when energy efficiency initiatives and other factors adversely affect revenues over this period.
7. Unless state commissions recognize the trend of falling gas use per customer in base rates, earnings will inevitably fall below authorized levels. Even if the utility is able to lower its costs between rate filings, it may not have a reasonable opportunity to earn its allowed rate of return.
8. Unless state commissions are willing to remove fixed costs from the volumetric charge, RD is the only viable alternative in protecting shareholders' interest from fluctuating sales.
9. RD can actually reduce risks to consumers by suppressing gas bill volatility.
10. RD eliminates a major controversial issue in rate cases, namely, the calculation of test-year sales.
11. As an alternative to RD, lost revenue adjustment (LRA) from energy efficiency initiatives would require evaluation and verification of savings from utility-initiated energy conservation programs. Under LRA, an incentive problem arises where a utility would have an incentive to maximize measured or reported savings but to achieve minimal actual savings from energy efficiency initiatives.
12. By stimulating energy efficiency initiatives, RD can benefit both gas consumers and society in the long run (for example, lower consumer gas bills from the pursuit of these initiatives).
13. The ability of a utility to recover its fixed costs should not hinge on its actual sales, over which the utility has little control.
14. Full recovery of fixed costs in the customer charge would reduce the incentive of customers to conserve since, at the margin, customers would save less money from curtailing their gas usage.

15. RD could reduce overall gas demand, thereby placing downward pressure on wholesale gas prices.
16. RD is easy for state commissions to monitor.
17. RD improves a utility's financial situation and lowers its risk from the perspective of the financial community.
18. RD is critical in transforming a utility from a seller of least-cost gas service to a provider of least cost energy services.
19. RD does not affect a utility's incentive to minimize costs and pursue operating efficiencies. "Revenue Decoupling for Natural Gas Utilities," pages 14, 15, endnotes omitted.

In July 2004, the American Gas Association and the Natural Resources Defense Counsel issued a joint statement to the National Association of Regulatory Commissioners that was intended to identify "ways to promote both economic and environmental progress by removing barriers to natural gas distribution companies' investments in urgently needed and cost-effective resources and infrastructure," and encourage regulators to consider "innovative programs that encourage increased total energy efficiency and conservation in ways that will align the interests of state regulators, natural gas utility company customers, utility shareholders, and other stakeholders." The primary problem that the Joint Statement identifies is what it refers to as the "Energy Efficiency Problem," under which utilities are "penalized" for aggressively promoting energy efficiency. According to the Statement, the penalty results from the mismatch of (fixed) costs and (volumetric) rates that is documented for Washington Gas in the Direct Testimony of Paul H. Raab in this docket:

The vast majority of the non-commodity costs of running a gas distribution utility are fixed and do not vary significantly from month to month. However, traditional utility rates do not reflect this reality. Traditional utility rates are designed to capture most of approved revenue requirements for fixed costs through volumetric retail sales of natural gas, so that a utility can recover these costs fully only if its customers consume a minimum amount of natural gas (these amounts are normally calculated in rate cases and generally are based on what consumers consumed in the past). Thus, many states' rate structures offer - quite unintentionally - a significant financial disincentive for natural gas utilities to aggressively encourage their customers to use less natural gas, such as by providing financial incentives and education to promote energy-efficiency and conservation techniques.

When customers use less natural gas, utility profitability almost always suffers, because recovery of fixed costs is reduced in proportion to the reduction in sales. Thus, conservation may prevent the utility from recovering its authorized fixed costs and earning its state-allowed rate of return.

This statement enjoyed broad support and was also endorsed by the Alliance to Save Energy and the American Council for an Energy Efficient Economy

("ACEEE"). The ACEEE has an extensive library of studies that address this topic on their website. For example, please see "Balancing Interests: A Review of Lost Revenue Adjustment Mechanisms for Utility Energy Efficiency Programs" and "Aligning Utility Interests with Energy Efficiency Objectives: A Review of Recent Efforts at Decoupling and Performance Incentives."

Finally, many states have enacted legislation to directly address this specific problem and many state regulatory authorities have implemented some form of revenue decoupling for utilities as a result (see the Direct Testimony of Paul H. Raab in this docket for these states).

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1162

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-46

Q. **Weather Variability.** Please quantify, individually, the impacts that weather variability, warming temperatures, ongoing conservation, and efficiency efforts of customers have had on the Company's financial performance. Provide all workpapers supporting the information provided. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Please see the Direct Testimony of Paul H. Raab filed in this docket. Specifically, please see Exhibit WG (G)-5.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-47

Q. **Weather Variability.** Please quantify, individually, the impacts that weather variability, warming temperatures, ongoing conservation, and efficiency efforts of customers have had on the Company's customers' bills. Provide all workpapers used in the documents provided. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Please see the response to OPC Data Request No. 3, Question No. 46.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-48

Q. **Ratepayer Protection Mechanism.** Please describe in detail any ratepayer protection mechanisms that WGL has included in its decoupling proposal.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Like the RNA under which the Company has been operating in Maryland, the Company's proposal in this case is to impose a maximum $0.05/therm cap on the RNA adjustments in any month, thereby mitigating any volatility in month-to-month bills. For further details, please see the Direct Testimony of Company Witness Lawson in this proceeding.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-49

Q. **Return on Equity/Decoupling.** For each month from January 2019 through December 2019, please provide the Company's actual return on equity and the return on equity that would have been realized had the proposed revenue decoupling mechanism been in place. Use the capital structure and corresponding cost rates for the twelve months ending December 31, 2017 in calculating the return on equity. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S OBJECTION **03/18/2020**

Washington Gas objects to this request on the grounds that it would require the performance of a special study which the Company has not performed.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-50

Q. **Financials/Decoupling.** Provide a recast of the Company's financial results (this would include revenue, expenses, rate base, capital, return on equity, and return on rate base), separately for gas operations, for each of the years 2014 through 2019, assuming the Company's proposed revenue decoupling mechanism had been implemented in 2014 through 2019 and using 2012 as the base year. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S OBJECTION **03/18/2020**

Washington Gas objects to this request on the grounds that it would require the performance of a special study which the Company has not performed.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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OPC DATA REQUEST NO. 3

QUESTION NO. 3-51

Q. **Cost Incentives.** Please identify all incentives the Company currently has (without decoupling) to efficiently manage costs. Provide all documents, studies, analyses, and any other evidence which supports the Company's response.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Like the RNA under which the Company has been operating in Maryland, the Company's proposal in this case is to impose a maximum $0.05/therm cap on the RNA adjustments in any month, thereby mitigating any volatility in month-to-month bills. For further details, please see the Direct Testimony of Company Witness Lawson in this proceeding.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-52

Q. **Incentives/Decoupling.** Please identify any incentives that decoupling will provide the Company to efficiently manage costs. Provide all documents, studies, analyses, and any other evidence which supports the Company's response.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Decoupling will not provide the Company with additional incentives to efficiently manage costs, nor will it reduce the incentives that already exist. No documents, studies, analyses, or any other evidence are needed to support this commonsense statement.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1162

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-53

Q. **Business Risk.** Please identify any business risks that will be eliminated as a result of decoupling. Provide all documents, studies, analyses, and any other evidence which supports the Company's response.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. Revenue decoupling primarily reduces the risk that the utility will not recover the revenues that the Commission determines to be appropriate in the current case, due to factors over which the utility has little control. For a discussion of these factors, please see the response to OPC Data Request No. 3, Question No. 39.

SPONSOR: Paul H Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 3

QUESTION NO. 3-56

Q. **Revenue Normalization Adjustment ("RNA").** Please refer to page 15, lines 8-12 of the Direct Testimony of Andrew Lawson where he states "In order to limit potential month-to-month volatility in the RNA adjustment, the Company proposes to limit the RNA adjustment to no more than $0.05 per therm."

a. Please explain in detail how the Company determined that $0.05 per therm was the appropriate limit to set for the RNA adjustment.
b. Please identify all other gas utilities of which the Company is aware that have a decoupling mechanism that limits the adjustment to no more than $0.05 per therm.
c. With respect to (a) and (b) above, please provide all source documents and workpapers. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE **04/01/2020**

A. a. The proposed RNA adjustment cap of $0.05 per therm was first introduced in the Company's RNA mechanism in its Maryland service territory. The Company's proposed RNA in this proceeding will operate identically to its mechanism in Maryland. In Maryland, the monthly adjustment cap was negotiated through settlement by parties with disparate interests.

b. I am not aware of any other utilities that employ a $0.05 per therm adjustment cap; however, other utilities, such as Baltimore Gas & Electric, employ an adjustment cap in the revenue normalization adjustment.

c. There are no workpapers associated with this response.

SPONSOR: Andrew Lawson
Regulatory Affairs Manager

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1162

WASHINGTON GAS‘S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE’S COUNSEL

OPC DATA REQUEST NO. 12

QUESTION NO. 12-5

Q. **Decoupling/Earnings.** After WGL’s last rate case, has WGL conducted any study or analysis of the impact on the Company’s earnings or return on equity if decoupling was implemented? If so, please provide a copy of such studies or analyses in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS’S RESPONSE 06/04/2020

A. Not specifically. However, the Company has prepared an analysis of the impact on the Company’s earnings given that decoupling was not implemented and this analysis is presented in the Direct Testimony of Paul H. Raab, Exhibit WG (G), and summarized in Exhibit WG (G)-5 supporting that testimony. Using test year cost data and calculated lost margins from Exhibit WG (G)-5 for 2018 (-$3,892,607), the impact on the Company’s return on rate base is calculated to be -0.5194%. Using test year cost data and calculated lost margins from Exhibit WG (G)-5 for 2019 (-$4,947,979), the impact on the Company’s return on rate base is calculated to be -0.6602%. These calculations are provided in the attached spreadsheet entitled OPC_12_5.xlsx. Although the Company has not made the calculation, the impact on return on equity can be easily determined from these amounts based on the test year capital structure and cost of debt.

SPONSOR: Paul H. Raab
Consultant

WASHINGTON GAS
CLASS COST OF SERVICE STUDY
TEST YEAR ENDING 12/31/2019

FC-1162
OPC No. 12-5
Attachment 1

SUMMARY OF RESULTS

			WG Test Year $	Proposed Increases $	WG @ Proposed ROR $	Revenue Loss $	WG @ Proposed ROR $
1	Operating Revenues		175,373,425	25,557,223	200,930,648	(3,892,607)	197,038,041
2							
3	Operating Expenses:						
4							
5	Operating & Maintenance		72,262,586	-	72,262,586		72,262,586
6	Uncollectible Expense	1.924%	-	491,674	491,674	(74,887)	416,787
7	Depreciation & Amortization		25,057,081	-	25,057,081		25,057,081
8	Interest on Customer Deposits		26,628	-	26,628		26,628
9	Taxes Other Than Income		54,440,432	-	54,440,432		54,440,432
10							
11	Total Operating Expenses		151,786,726	491,674	152,278,400	(74,887)	152,203,514
12							
13	Income Before Taxes		23,586,699	25,065,549	48,652,248	(3,817,721)	44,834,527
14							
15	Income Taxes:						
16							
17	State Income Taxes	8.25%	-	2,067,908	2,067,908	(314,962)	1,752,946
18	Federal Income Taxes	21.00%	-	4,829,505	4,829,505	(735,579)	4,093,925
19	Test Year		1,925,024	-	1,925,024	-	1,925,024
20							
21	Total Income Taxes		1,925,024	6,897,412	8,822,437	(1,050,541)	7,771,895
22							
23	AFUDC		809,650	-	809,650	-	809,650
24							
25	Operating Income		22,471,325	18,168,136	40,639,461	(2,767,179)	37,872,282
26							
27	Total Rate Base		532,809,792	-	532,809,792	-	532,809,792
28							
29	Rate of Return	7.6274%	4.2175%		7.6274%	-0.5194%	7.1080%

WASHINGTON GAS
CLASS COST OF SERVICE STUDY
TEST YEAR ENDING 12/31/2019

SUMMARY OF RESULTS

			WG Test Year $	Proposed Increases $	WG @ Proposed ROR $	Revenue Loss $	WG @ Proposed ROR $
1	Operating Revenues		175,373,425	25,557,223	200,930,648	(4,947,979)	195,982,669
2							
3	Operating Expenses:						
4							
5	Operating & Maintenance		72,262,586	-	72,262,586		72,262,586
6	Uncollectible Expense	1.924%	-	491,674	491,674	(95,190)	396,484
7	Depreciation & Amortization		25,057,081	-	25,057,081		25,057,081
8	Interest on Customer Deposits		26,628	-	26,628		26,628
9	Taxes Other Than Income		54,440,432	-	54,440,432		54,440,432
10							
11	Total Operating Expenses		151,786,726	491,674	152,278,400	(95,190)	152,183,210
12							
13	Income Before Taxes		23,586,699	25,065,549	48,652,248	(4,852,789)	43,799,459
14							
15	Income Taxes:						
16							
17	State Income Taxes	8.25%	-	2,067,908	2,067,908	(400,355)	1,667,553
18	Federal Income Taxes	21.00%	-	4,829,505	4,829,505	(935,011)	3,894,493
19	Test Year		1,925,024	-	1,925,024	-	1,925,024
20							
21	Total Income Taxes		1,925,024	6,897,412	8,822,437	(1,335,366)	7,487,070
22							
23	AFUDC		809,650	-	809,650	-	809,650
24							
25	Operating Income		22,471,325	18,168,136	40,639,461	(3,517,423)	37,122,038
26							
27	Total Rate Base		532,809,792	-	532,809,792	-	532,809,792
28							
29	Rate of Return	7.6274%	4.2175%		7.6274%	-0.6602%	6.9672%

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1162

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 12

QUESTION NO. 12-6

Q. **Decoupling/Past Financials.** After WGL's last rate case, has WGL conducted any study or analysis of the impact on the Company's financial performance (including as to WGL's earned revenue, expenses, rate base, capital, return on equity, and/or return on rate base) if its decoupling proposal was implemented? If so, please provide a copy of such studies or analyses in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE 06/04/2020

A. Please see the response to OPC Data Request No. 12, Question No. 5 for the impact that the lack of an RNA has had on the Company's earned revenue and return on rate base. The Company's decoupling proposal has little or no impact on (non-gas) expenses, rate base, and capital.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 12

QUESTION NO. 12-7

Q. **Decoupling/Projected Financials.** How does WGL anticipate its decoupling proposal will affect its financial performance during the rate period, including as to WGL's revenues, expenses, rate base, capital, return on equity, and return on rate base?

WASHINGTON GAS'S RESPONSE 06/04/2020

A. The Company anticipates that its decoupling proposal will provide it with revenues and corresponding returns on equity and rate base that are more consistent with the Commission's order in this case. The Company further anticipates that its decoupling proposal will have little or no impact on (non-gas) expenses, rate base, and capital.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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OPC DATA REQUEST NO. 15

QUESTION NO. 15-3

Q. **Effect of COVID-19 on May 15 Supplemental Filing.** Please address the following:

a. Did WGL make any adjustments or otherwise take into account the effects of the current COVID-19 pandemic in its May 15 Supplemental Filing?

b. If the response to (a) is yes, please identify each adjustment that WGL made and provide specific references to all documents in which these adjustments are reflected.

c. If the response to (a) is yes, provide specific references to all areas of the Company's original rate case filing (or other document submitted in this proceeding) that the Company updated in recognition of the potential impacts of the current COVID-19 pandemic.

d. Provide all documents, workpapers, and source data used to support the responses to (a) through (c) above in electronic form with all spreadsheet links and formulas intact used to respond to this request. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE 06/12/2020

A. a. Washington Gas did not make any adjustments or otherwise take into account the effects of the current COVID-19 pandemic in its Supplemental Filing.

b. N/A

c. N/A

d. N/A

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
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OPC DATA REQUEST NO. 15

QUESTION NO. 15-4

Q. **Effect of COVID-19 on RNA Proposal.** Please address the following:

a. Has the Company estimated the effect the current COVID-19 pandemic will have on the proposed RNA?

b. If the response to (a) is yes, please provide all analyses the Company has in its possession that estimate the effect the current COVID-19 pandemic will have on the proposed RNA.

c. Provide all documents, workpapers, and source data used to support the response to (b) in electronic form with all spreadsheet links and formulas intact. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S RESPONSE 06/12/2020

A. (a) No, the Company has not estimated the effect the current COVID-19 pandemic will have on the proposed RNA.

(b) Not applicable

(c) Not applicable

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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WASHINGTON GAS'S RESPONSE
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THE OFFICE OF PEOPLE'S COUNSEL

OPC DATA REQUEST NO. 15

QUESTION NO. 15-5

Q. **Forecasts of Natural Gas Sales for Rate Year.** Please address the following:

a. Please provide the Company's most recent forecast of natural gas sales for the rate year by customer class.

b. With respect to (a), please explain if this forecast accounts for the impact of the current COVID-19 pandemic.

c. If the response to (b) is yes, please provide the Company's most recent forecast of natural gas sales for the rate year by customer class prior to the onset of the current COVID-19 pandemic.

d. If the response to (b) is no, please provide the Company's most recent forecast of natural gas sales for the rate year by customer class subsequent the onset of the current COVID-19 pandemic.

e. Provide all documents, workpapers, and source data used to support the responses to (a) through (d) above in electronic form with all spreadsheet links and formulas intact used to respond to this request. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S OBJECTION **05/29/2020**

Washington Gas objects to this request on the grounds that it seeks information that is irrelevant to this proceeding. Washington Gas proposed Distribution Service Adjustments and removed gas sales from the cost of service in this case, consistent with the Commission's directive in Formal Case No. 1093.

WASHINGTON GAS'S RESPONSE 06/12/2020

A.

(a) Please see the response to OPC Data Request No. 3, Question No. 54.

(b) This forecast does not account for the impact of the current COVID-19 pandemic.

(c) Not applicable.

(d) The Company has not yet prepared a forecast for the rate year by customer class subsequent to the onset of the current COVID-19 pandemic.

(e) Not applicable.

SPONSOR: Paul H. Raab
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
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OPC DATA REQUEST NO. 15

QUESTION NO. 15-6

Q. **Forecasts of Natural Gas Sales Revenues for Rate Year.** Please address the following:

a. Please provide the Company's most recent forecast of natural gas sales revenues for the rate year by customer class.

b. With respect to (a), please explain if this forecast accounts for the impact of the current COVID-19 pandemic.

c. If the response to (b) is yes, please provide the Company's most recent forecast of natural gas sales revenues for the rate year by customer class prior to the onset of the current COVID-19 pandemic.

d. If the response to (b) is no, please provide the Company's most recent forecast of natural gas sales revenues for the rate year by customer class subsequent the onset of the current COVID-19 pandemic.

e. Provide all documents, workpapers, and source data used to support the responses to (a) through (d) above in electronic form with all spreadsheet links and formulas intact used to respond to this request. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

WASHINGTON GAS'S OBJECTION **05/29/2020**

Washington Gas objects to this request on the grounds that it seeks information that is irrelevant to this proceeding. Washington Gas proposed Distribution Service Adjustments and removed gas sales from the cost of service in this case, consistent with the Commission's directive in Formal Case No. 1093.

WASHINGTON GAS'S RESPONSE 06/12/2020

A.

(a) Please see the response to OPC Data Request No. 3, Question No. 55.

(b) This forecast does not account for the impact of the current COVID-19 pandemic.

(c) Not applicable.

(d) The Company has not yet prepared a forecast for the rate year by customer class subsequent to the onset of the current COVID-19 pandemic.

(e) Not applicable.

SPONSOR: Paul H. Raab
Consultant

DISTRICT OF COLUMBIA
BEFORE THE
PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF WASHINGTON GAS LIGHT COMPANY FOR AUTHORITY TO INCREASE EXISTING RATES AND CHARGES FOR GAS SERVICE	))))	**FORMAL CASE NO. 1162**

DECLARATION OF DENNIS W. GOINS

I, Dennis W. Goins, do hereby declare under penalty of perjury that I am authorized to make this Declaration on behalf of the General Services Administration; that the foregoing testimony and exhibits were prepared by me or under my direction and supervision; and that the contents therein are true and correct to the best of my knowledge, information, and belief.

Dennis W. Goins

August 14, 2020