STATE OF TENNESSEE

Office of the Attorney General

HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

August 21, 2015

Sharla Dillon
Docket and Records Office
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Petition of B&W Pipeline, LLC for an Increase in Rates - TRA Docket No. 15-00042

Dear Ms. Dillon:

On August 11, 2015, Ralph C. Smith filed Direct Testimony and exhibits in this docket on behalf of the Tennessee Attorney General Consumer Advocate and Protection Division.

The revenue requirement calculation on Schedule A of Mr. Smith's Exhibit RCS-1, should be pulling the adjusted total rate base amount from Schedule B, line 11 rather than line 7, the net plant amount. Attached is a corrected version of Schedule A. Also attached is a revised Schedule E, page 1, which showed an illustrative rate design using the revenue requirement from Schedule A. The direct testimony mentioned certain dollar amounts that were impacted by this correction.

The following table lists the corrections of the related dollar amounts that were mentioned in the testimony:

Page	Line	Reads	Should Read
5	13	$27,199	$37,651
24	21	$27,199	$37,651
24	22	$154,776	$165,228
25	6	$0.36	$0.41

Attached for filing is a corrected version of Mr. Smith's Direct Testimony. We apologize for any inconvenience this causes.

Sincerely,

Rachel A. Newton by Vance Bruemel

Rachel A. Newton
Assistant Attorney General

cc: All parties of record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

Petition of B&W Pipeline, LLC	)	
For an Increase in Rates	)	DOCKET NO. 15-00042

PRE-FILED DIRECT TESTIMONY OF

RALPH C. SMITH

ON BEHALF OF THE TENNESSEE ATTORNEY GENERAL
CONSUMER ADVOCATE AND PROTECTION DIVISION

August 11, 2015

[Resubmitted August 19, 2015]

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE:	)	
PETITION OF B&W PIPELINE, LLC	)	
FOR AN INCREASE IN RATES	)	**DOCKET NO. 15-00042**

AFFIDAVIT

I, Ralph Smith, CPA, on behalf of the Consumer Advocate Division of the Attorney General's Office, hereby certify that the attached Direct Testimony represents my opinion in the above-referenced case and the opinion of the Consumer Advocate Division.

Ralph C Smith

Ralph Smith

Sworn to and subscribed before me
this 19 day of August 2015.

Hugh Larkin Jr

NOTARY PUBLIC

HUGH LARKIN JR
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Sep 13, 2019
ACTING IN COUNTY OF

My commission expires: ______

ATTACHMENTS

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

August 11, 2015

DOCKET NO. 15-00042

PRE-FILED DIRECT TESTIMONY OF RALPH C. SMITH

Q.1 What are your name, occupation and business address?

A.1 My name is Ralph C. Smith. I am a Certified Public Accountant licensed in the State of Michigan and a senior regulatory consultant in the firm Larkin & Associates, PLLC, Certified Public Accountants, with offices at 15728 Farmington Road, Livonia, Michigan 48154.

Q.2 Please describe the firm Larkin & Associates, PLLC.

A.2 Larkin & Associates, PLLC, is a Certified Public Accounting and Regulatory Consulting Firm. The firm performs independent regulatory consulting primarily for public service/utility commission staffs and consumer interest groups (public counsels, public advocates, consumer counsels, attorneys general, etc.). Larkin & Associates, PLLC has extensive experience in the utility regulatory field, providing expert witness testimony in over 600 regulatory proceedings, including numerous gas, electric, water, wastewater, and telephone utility cases.

Q.3 Mr. Smith, please summarize your educational background and recent work experience.

A.3 I received a Bachelor of Science degree in Business Administration (Accounting Major) with distinction from the University of Michigan - Dearborn, in April 1979. I passed all parts of the C.P.A. examination on my first sitting in 1979, received my

C.P.A. license in 1981, and received a certified financial planning certificate in 1983. I also have a Master of Science in Taxation from Walsh College, 1981, and a law degree (J.D.) cum laude from Wayne State University, 1986. In addition, I have attended a variety of continuing education courses in conjunction with maintaining my accountancy license. I am a licensed Certified Public Accountant and attorney in the State of Michigan. Since 1981, I have been a member of the Michigan Association of Certified Public Accountants. I am also a member of the Michigan Bar Association. I have also been a member of the American Bar Association (ABA), and the ABA sections on Public Utility Law and Taxation.

Q.4 Please summarize your professional experience.

A.4 After graduating from the University of Michigan, and after a short period of installing a computerized accounting system for a Southfield, Michigan realty management firm, I accepted a position as an auditor with the predecessor CPA firm to Larkin & Associates in July 1979. Before becoming involved in utility regulation where the majority of my time for the past 35 years has been spent, I performed audit, accounting, and tax work for a wide variety of businesses that were clients of the firm.

During my service in the regulatory section of our firm, I have been involved in rate cases and other regulatory matters concerning numerous electric, gas, telephone, water, and sewer utility companies. My present work consists primarily of analyzing rate case and regulatory filings of public utility companies before various regulatory commissions, and, where appropriate, preparing testimony and schedules relating to the issues for presentation before these regulatory agencies.

I have performed work in the field of utility regulation on behalf of industry, state attorneys general, consumer groups, municipalities, and public service commission staffs concerning regulatory matters before regulatory agencies in Alabama, Alaska, Arizona, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, New Jersey, New Mexico, New York, Nevada, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Washington, Washington D.C., West Virginia, and Canada as well as the Federal Energy Regulatory Commission and various state and federal courts.

Q.5 Have you previously testified before the Tennessee Regulatory Authority ("TRA")?

A.5 No, I have not testified before the TRA.

Q.6 Have you previously testified before other state regulatory commissions?

A.6 Yes. I have previously submitted testimony before many other state regulatory commissions, including Alaska, Arizona, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, New Jersey, New Mexico, New York, Nevada, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, South Carolina, Texas, Vermont, Virginia, Washington, Washington D.C., and West Virginia.

Q.7 Have you prepared an appendix describing your qualifications and experience?

A.7 Yes. Appended to my testimony is Appendix RCS-1, which is a summary of my regulatory experience and qualifications.

Q.8 On whose behalf are you appearing?

A.8 Larkin & Associates, PLLC, was retained by the Consumer Advocate and Protection Division ("CAPD") of the Attorney General's Office. Accordingly, I am appearing on behalf of the CAPD.

Q.9 What is the purpose of your testimony in this proceeding?

A.9 The purpose of my testimony is to present to the TRA the results of the revenue requirement for B&W Pipeline, LLC ("B&W," "B&W Pipeline" or "the Company") using the attrition period rate base and operating income as shown on CAPD Exhibit RCS-1, Schedules B and C. To compute the revenue requirement for B&W Pipeline, I have also used the recommended return on equity of 8.5 percent recommended by CAPD witness Christopher Klein. CAPD Exhibit RCS-1, Schedule D, summarizes the return on equity and cost of capital requested by the Company and recommended by CAPD witness Klein. I also present a recommendation for designing rates to provide the Company with an opportunity to recover the revenue requirement that is being recommended. The proposed rate design framework is presented on CAPD Exhibit RCS-1, Schedule E, and includes a combination of fixed charge and volumetric rates for the gas transportation service that is provided by B&W Pipeline to its affiliates and to Navitas TN NG LLC ("Navitas"), a gas distribution utility that receives its gas via gas transportation service through the B&W Pipeline.

Q.10 Have you prepared an Exhibit that summarizes the results of your analysis and recommendations?

A.10 Yes. CAPD Exhibit RCS-l presents revenue requirement and adjustment schedules that I am sponsoring.

Q.11 What does Exhibit RCS-I, Schedule A show?

A.11 Exhibit RCS-1, Schedule A presents B&W's calculation of its proposed rate year revenue deficiency in column A. Column A shows B&W's proposed revenue requirement from Company Exhibit, Schedule 1, of its Application. As shown on line 8 of column A, B&W's Application shows a revenue deficiency of $525,648, based on a requested return of 10.12%, a requested rate base of $2.575 million, and a net operating loss of $265,112.

Column B shows the revenue requirement calculation that results from my recommendations and the recommendations of CAPD witness Klein concerning return on equity. For B&W's pipeline utility operations for the 2016 rate year I show a revenue deficiency of $37,651.

Q.12 What Gross Revenue Conversion Factor have you used to derive the revenue deficiency?

A.12 As shown on Schedule A, I have used the same gross revenue conversion factor ("GRCF") of 1.000000 that was used by B&W. This factor is used on Schedule A, line 7, to convert the net operating income deficiency or sufficiency for the 2016 rate year into an equivalent revenue requirement amount. I agree with B&W's use of a GRCF of 1.0000000 in this case where the taxable income or loss flows to the owners' personal tax returns, via a series of pass-through entities consisting of LLCs that are in the ownership chain.

Q.13 Please briefly explain Schedules Band C of exhibit RCS-1.

A.13 Schedule B summarizes my recommended rate base for B&W. The adjustments which impact rate base are shown on Schedule B.

Schedule C presents adjusted net operating income and summarizes my recommended adjustment to revenue and expenses applicable to the ratemaking analysis.

Q.14 Please briefly discuss what is shown on Exhibit RCS-1, Schedule D.

A.14 Exhibit RCS-1, Schedule D first presents B&W's requested return on equity ("ROE") of 10.12%, which was based on averaging ROEs from three prior rate cases before the TRA involving gas distribution utilities. The three firms that B&W witness, Mr. Novak, has used are Atmos Energy, Piedmont Natural Gas, and Chattanooga Gas Company. They are all relatively large gas distribution operations whose stock, or that of their parent corporations, is publicly traded. Schedule D shows the overall rate of return that was authorized for each of those firms in the referenced cases, and the average of those, which is 7.89%. Finally, as also shown on Schedule D, for this case, I have used a rate of return of 8.5%, based on the recommendation of CAPD witness, Dr. Klein.

Q.15 Please discuss the ownership structure of B&W.

A.15 B&W operates a gas transportation pipeline that is approximately 50 miles long with a single unrelated customer, Navitas. B&W is an LLC owned by another LLC (FIR Energy), owned by another LLC (MI Energy), owned by another LLC (ID Energy), which is owned by several trusts. None of the entities in the B&W ownership chain has stock that is publicly traded. B&W's affiliates, including Enrema, LLC, and Rugby Energy, LLC, under the same ownership structure, are involved in the development and production of oil and gas. When the B&W pipeline was originally acquired from the previous owner, which occurred in conjunction with the Gasco bankruptcy, the acquisition included not only the pipeline but also included oil and gas wells in an area of northeastern Tennessee in which shale production was occurring.

Q.16 Are you recommending adjustments to B&W's rate base and operating income?

A.16 Yes. As shown on Exhibit RCS-1, Schedules 1 through 4, I am recommending four adjustments.

Q.17 What adjustment are you recommending to B&W's calculated revenue at current rates?

A.17 As shown on Exhibit RCS-1, Schedule 1, I am recommending that B&W's revenue at current rates be derived by multiplying the current transportation rate of $0.60 per Mcf by the combined estimated 2016 transportation volumes of 212,628 Mcf.

Q.18 What is the source for those estimated 2016 gas transportation volumes?

A.18 The source for the estimated 2016 gas transportation volumes of 47,450 Mcf for B&W's transportation of gas to the B&W affiliates is Company Exhibit, Schedule 4, line 4, which shows the B&W Pipeline Intercompany Transportation projected Mcf transportation volumes. The source for the 165,178 Mcf of estimated 2016 transportation throughput to Navitas is Navitas' July 17, 2015 response to data requests TRA 1-1 and 1-2, specifically Exhibit A to those responses, which lists the Navitas TN NG, LLC sales from gas supplied through the B&W Pipeline.

Q.19 What adjustment to revenue at current rates does the use of those 2016 gas transportation volumes produce?

A.19 As shown on Exhibit RCS-1, Schedule 1, in column C, the use of 2016 estimated combined gas transportation volumes of 212,628 Mcf produces revenue at current rates of $127,577, which is $25,660 more than the amount of $101,917 that was used in B&W's application.

Q.20 Do you have any other comments on the 2016 throughput estimates?

A.20 Yes. The 2016 estimated gas sales that were provided by Navitas include estimates for two new customers at estimated 2016 volumes of 108,000 Mcf and 12,000 Mcf, respectively.[1] The larger customer was identified during discussions with Navitas as having dual fuel capability, i.e., the customer can use either natural gas or propane for its operations; thus, keeping the cost of natural gas competitive with the alternative fuel could be very important in retaining that customer for Navitas' gas distribution utility operations and correspondingly retaining that customer's gas transportation volumes on the B&W Pipeline. Without that large customer's gas transportation volumes on the B&W Pipeline the B&W revenue requirement would have to be spread over a much smaller transportation volume, thus contributing to higher per-Mcf costs for other customers.[2] Consequently, sensitivity to the overall increase in transportation rates for B&W in the current case is an important consideration.

Q.21 Please discuss your next adjustment.

A.21 My next adjustment relates to the original cost of the pipeline under the previous owner, which B&W was unable to provide, and which I was unable to ascertain from alternative sources.

Q.22 What is original cost?

[1] These volumes compare with the 36,000 and 26,000 Mcf projected transportation throughput volumes listed on Company Exhibit, Schedule 4, lines 2 and 3.
[2] The B&W Pipeline transportation customers are the B&W affiliates (Intercompany transportation) and Navitas TN NG, LLC, the gas distribution utility.

A.22 Original cost is the cost of an asset when originally devoted to utility service.

Q.23 Why is it important to have reliable information on the original cost of assets that are used to provide regulated public utility service?

A.23 Having reliable information on original cost is very important for assets that are used to provide regulated public utility service because typical regulatory policy requires that original cost is used to develop the utility revenue requirements. Amounts paid to acquire a utility or for utility assets that are in excess of the selling utility's depreciated original costs are referred to as "Goodwill" or an acquisition premium, and are typically not allowed in rates. Public policy against allowing Goodwill amounts in rates has evolved over the years and is intended to prevent rate increases related to marking-up or inflating the cost of assets that are used to provide public utility service by buying and selling or transferring utility assets to different owners. In essence, the mere transfer of utility assets from one owner to another, even if it occurs at a higher cost, would not be sufficient to justify rate increases for the utility service being provided.

Q.24 What is "Goodwill" and how is Goodwill related to an acquisition premium?

A.24 Goodwill represents the excess, at the dates of acquisition, of the purchase price over the book value of the net tangible and identifiable intangible assets acquired and liabilities assumed relating to business acquisitions. Goodwill is carried at initial cost less any write-down for impairment. Goodwill is basically an intangible asset that arises as a result of the acquisition of one company by another for a premium value. Goodwill is usually recorded on the acquiring company's balance sheet and is considered an intangible asset because it is not a physical asset that, like buildings or equipment, plays any role in providing utility service. Put another way, Goodwill is the excess of the cost of a business acquisition accounted for by the purchase method of accounting over the fair value of its net assets.

Q.25 What is an Acquisition Premium?

A.25 An Acquisition Premium is the difference between the price paid for the utility plant and its original cost less the utility plant's depreciation, depletion, and amortization. An acquisition premium is the difference between the actual price paid to acquire a company or asset and the estimated real (Book) value of the acquired company or asset. An acquisition premium is most often recorded as "Goodwill" on the acquiring company's balance sheet. The size of an acquisition premium depends on various factors, which can include competition within the industry, the presence of other bidders, and the motivations of the buyer and seller. Companies may pay acquisition premiums for various reasons, including: (1) to ensure that the deal gets closed and (2) because they feel that the synergies of the acquired operations and/or combining the acquired operations with existing operations will be greater than the total price paid for the target.

Q.26 Can the creation of a large amount of Goodwill present risks to utility operations, even if there is not an attempt to recover the Goodwill directly from ratepayers?

A.26 Yes. Large amounts of Goodwill which are intangible assets that do not earn a return and which are not amortized can present a challenge for the acquiring company's management in a number of respects. Goodwill is not used or useful in the provision of utility service. Having large amounts of such assets on the books also requires the acquiring company to finance those assets by having long term capital sources such as debt and equity on the liabilities and shareholder equity side of its balance sheet.

Having large amounts of non-earning assets on a company's balance sheet can put pressure on earnings per share. Goodwill is also subject to periodic impairment testing. Impairments of Goodwill can result in large losses and can lead to reductions to recorded amounts of equity capital.

Q.27 What is "push down" accounting?

A.27 "Push down" accounting refers to the recording Goodwill (or some equivalent to Goodwill, such as an Acquisition Adjustment) on the books of a regulated utility.

Q.28 What is an Acquisition Adjustment?

A.28 An acquisition adjustment is the difference between a utility's own cost to acquire property and the depreciated original cost of that property. This is a summary of the definition used in the Uniform System of Accounts, Accounts 114 through 116.

Q.29 Was B&W ordered to use the Uniform System of Accounts?

A.29 Yes. In B&W's certificate proceeding, Docket No. 13-00151, it was noted in the TRA's January 8, 2015 Order at page 4 that: "B&W has not completed its transition to the Uniform System of Accounts, as required by TRA Rule 1220-4-1-.11 for public utilities." In paragraph 4 on page 4 of that decision, the TRA ordered that: "B&W Pipeline, LLC is directed to use the Uniform System of Accounts as required by Tenn. Code Ann. §65-4-111 and TRA Rule 1220-4-1-.11."

Q.30 Has B&W complied with that part of the Order?

A.30 Not fully. The Uniform System of Accounts requires that acquisition cost in excess of depreciated original cost be recorded in an Acquisition Adjustment account and not as Plant in Service. The instructions provided that the detailed gas plant accounts (301 to 399, inclusive) shall be stated on the basis of cost to the utility of plant constructed by it and the original cost, estimated if not known, of plant acquired as an operating unit or system. The difference between the original cost as above, and the cost to the utility of gas plant after giving effect to any accumulated provision for depreciation, depletion, or amortization shall be recorded in account 114, Gas Plant Acquisition Adjustments. The original cost of gas plant shall be determined by analysis of the utility's records or those of the predecessor or vendor companies with respect to gas plant previously acquired as operating units or systems and the differences between the original cost so determined, less accumulated provisions for depreciation, depletion and amortization, and the cost to the utility, with necessary adjustments for retirements from the date of acquisition, shall be entered in account 114, Gas Plant Acquisition Adjustments. Any difference between the cost of gas plant and its book cost, when not properly includable in other accounts, shall be recorded in account 116, Other Gas Plant Adjustments. The USOA instructions for Account 114, Gas Plant Acquisition Adjustments, provides as follows:

> 114 Gas plant acquisition adjustments.
>
> A. This account shall include the difference between (a) the cost to the accounting utility of gas plant acquired as an operating unit or system by purchase, merger, consolidation, liquidation, or otherwise, and (b) the original cost, estimated, if not known, of such property, less the amount or amounts credited by the accounting utility at the time of acquisition to accumulated provisions for depreciation, depletion, and amortization and contributions in aid of construction with respect to such property.
>
> B. With respect to acquisitions after the effective date of this system of accounts, this account shall be subdivided so as to show the amounts included herein for each property acquisition and to gas plant in service, gas plant held for future use and gas plant leased to others. (See gas plant instruction 5.)
>
> C. Debit amounts recorded in this account related to plant and land acquisition may be amortized to account 425, Miscellaneous Amortization, over a period not longer than the estimated remaining

> life of the properties to which such amounts relate. Amounts related to the acquisition of land only may be amortized to account 425 over a period of not more than 15 years. Should a utility wish to account for debit amounts in this account in any other manner, it shall petition the Commission for authority to do so. Credit amounts recorded in this account shall be accounted for as directed by the Commission.

B&W did not ascertain the depreciated original cost of the pipeline from the previous owner. As noted in the TRA's January 8, 2015 Order in Docket No. 13-00151, the pipeline was previously owned by The Titan Energy Group, Inc., a subsidiary of Gasco Distribution Systems, Inc. ("Gasco"), which held a Certificate of Public Convenience and Necessity ("CCN") from the TRA.

Q.31 Was this pipeline previously used in the provision of utility service?

A.31 Yes, under Gasco ownership, the pipeline was used to transport gas from gas wells that are connected to the pipeline, as well as gas flowing into the pipeline via its interconnection with the Tennessee Eastern pipeline, for use by customers served by the Gasco gas distribution utility. As noted in the TRA's January 8, 2015 Order in Docket No. 13-00151, the pipeline was previously owned by a subsidiary of Gasco, which held a CCN from the TRA.

Q.32 How was the pipeline acquired by B&W?

A.32 In conjunction with the bankruptcy of Gasco, the pipeline was separate from Gasco's distribution system assets. The pipeline was originally sold by Titan Energy Group to Highland Rim Energy on June 11, 2010. Highland Rim Energy assigned its rights under the purchase agreement with Titan Energy Group to B&W on September 2, 2010.[3]

[3] See, e.g., the TRA's January 8, 2015 Order in the B&W CCN proceeding, Docket No. 13-00151, at page 2.

Q.33 Has B&W identified the original cost of the pipeline under the previous owner?

A.33 No. In conjunction with the transfers of the pipeline from Gasco's subsidiary to Highland Rim Energy and from Highland Rim Energy to B&W, the depreciated original cost of the pipeline under Gasco's ownership was not determined. As an illustration, B&W's response to CAPD 1-7 states that:

> FIR Energy purchased the assets of B&W Pipeline from the previous owners in bankruptcy court in 2010. The wells that were purchased from the previous owners have since been transferred to Rugby Energy, LLC leaving B&W Pipeline with only the pipeline assets. **B&W has no information on the net book value of the assets of the previous owners.**
>
> (Emphasis supplied.)

Q.34 Is it possible that the pipeline was either not recorded as an asset on Gasco's books or had been fully depreciated on Gasco's books prior to its acquisition by B&W?

A.34 That is possible. A review of Gasco's annual report to the TRA from periods prior to the transfer reveals no obvious assets for the gas transmission pipeline. Page F-4 of the Gasco 2009 annual report shows total Utility Plant in Service of $1,845,923 and Accumulated Depreciation of $896,375 and Net Utility Plant of $949,549; however, that presentation does not distinguish between the components of Gasco's utility plant and the plant listed there could be for Gasco's gas distribution system. Gasco's 2009 annual report also shows annual depreciation of approximately $65,000 per year.

Q.35 Did you also review state property tax information when the pipeline was owned by Gasco and Gasco's subsidiary, Titan Energy Group, to attempt to ascertain the cost of the pipeline that had been recorded by Gasco?

A.35 Yes. The CAPD obtained and I reviewed available property tax information for Gasco. The Gasco property tax information listed assessed values by county; however, there were gaps in the information and apparently some records were lost during a flood and are no longer available. The available information did not enable me to ascertain the original cost to Gasco for the pipeline. No separate state property tax information was available for Titan Energy Group. Given the lack of reliable information on the depreciated original cost for the pipeline of the previous owner, Gasco, a presumption of a zero would be one way to address this issue, and a way which would keep the burden of proof on the current owner, B&W.

Q.36 Were the Gasco gas distribution system assets transferred to another company?

A.36 Yes. The Gasco gas distribution system was acquired by Navitas. Navitas is now operating the gas distribution system and is obtaining its gas via transportation service using the pipeline that is now owned by B&W.

Q.37 If the depreciated original cost of the previous owner was zero at the time of the acquisition, how would the acquisition price be recorded on the books of the acquiring Company under the Uniform System of Accounts?

A.37 If the depreciated original cost of the previous owner was zero at the time of the acquisition, the acquisition price would be recorded on the books of the acquiring Company under the Uniform System of Accounts as an Acquisition Adjustment in account 114.

Q.38 How did B&W record the acquisition price?

A.38 B&W recorded the acquisition price for the pipeline as Plant in Service. That accounting was not in accordance with the Uniform System of Accounts.

Q.39 Are there concerns regarding B&W's recording of the purchase price and assigning that to the pipeline that extend beyond B&W's failure to ascertain

depreciated original cost of the previous owner and to record the amount paid above the previous owner's depreciated original cost as an Acquisition Adjustment in account 114 of the Uniform System of Accounts?

A.39 Yes. There are also concerns that B&W has attempted to assign or allocate too much of its purchase price to the pipeline and too little to the oil and gas wells that were acquired from Titan Energy Group with the pipeline. As described in B&W's response to CAPD 2-1, B&W claims that the bankruptcy court would not consider a pipeline only purchase, and as also described in the response to CAPD 2-1, the Company acquired 96 oil and gas wells along with the pipeline, but assigned none of the cost to the oil and gas wells. B&W claims that the net value of the oil and gas wells it acquired along with the pipeline was negative $29,845. This was apparently based on calculations by B&W of the estimated cost of capping non-producing wells. The response to CAPD 2-1 states that: "The Company calculated the value of an active producing oil well at $31,900 and the value of an active producing gas well at $29,043. However, the liability associated with capping an inactive well was $5,115. As shown ... the liability associated with capping all of the inactive wells exceeded the value of the active wells by $29,845. Therefore none of the acquisition cost from the bankruptcy court was assigned to the wells since they had no value."

Q.40 Should such statements by B&W that the oil and gas wells had no value be viewed with skepticism?

A.40 Yes. The owners of B&W are in the business of oil and gas production. Prior to acquiring the pipeline, there is no indication that B&W's owners were ever in the public utility business. While the gas transportation pipeline is being regulated as a public utility, their primary business appears to be oil and gas development and production. The net zero value assigned by B&W to the oil and gas wells that were acquired in an area of Tennessee with shale production must therefore be viewed with extreme skepticism. The response to CAPD 1-6, states, among other things, that FIR Energy has invested, using funds supplied by MI Energy, $16.6 million in the larger gas and oil development in Tennessee.

Q.41 How much revenue was being generated for gas transmission by B&W in 2012 and how much gross profit was generated by oil and gas production in that same year?

A.41 B&W's 2012 information shows the gross profit[4] of $182,582 includes $19,729 for the provision of gas transportation services to Navitas and $162,853 of gross profit from oil and gas sales and royalties. Thus, approximately 11% of B&W's gross profit for 2012 was from gas transportation service and 89% was from oil and gas sales and royalties.

Q.42 Did B&W subsequent transfer the oil and gas wells to another affiliate?

A.42 The oil and gas wells were subsequently transferred by B&W to another affiliate, Rugby Energy, LLC. The oil and gas wells in production are being operated by another affiliate, Enrema, LLC, which is the same affiliate that is charging an Operator Fee to B&W.

Q.43 Are there concerns about that transfer as well?

[4] Gross Profit on the B&W trial balance for 2012 is revenue after subtracting the cost of the oil and gas sold, and before operating expenses.

A.43 Yes. That transfer was not made at arms' length. It was a transfer between two wholly controlled affiliates both of which have the same ownership. There are concerns that B&W did not receive adequate compensation for the wells that it acquired and transferred to the affiliate, Rugby Energy, LLC. There are concerns that B&W was not compensated by the affiliate for the market value of the oil and gas wells that were transferred to the affiliate. Additionally, as explained above there are concerns that B&W assigned none of the acquisition cost to the oil and gas wells, thus none of B&W's acquisition cost for the pipeline and wells were allocated to the wells that were transferred from B&W to the affiliate. It appears that the only costs transferred by B&W to the affiliate, Rugby Energy, LLC related to the transfer of the oil and gas wells were costs that B&W had incurred after acquiring the wells, such as costs for improvements to the wells since the acquisition.

Q.44 Have you been able to ascertain the original cost of the pipeline under the previous owner?

A.44 No. Despite a diligent search of public records, including Gasco reports filed with the TRA and property tax records during the period when the pipeline was owned by Gasco, reliable information on original cost of the pipeline when owned by Gasco does not appear to exist or have been retained.

Q.45 What is your understanding of the burden of proof in the current B&W rate case?

A.45 It is my understanding that the burden of proof lies with B&W.

Q.46 Did B&W record any amounts as Goodwill or as an Acquisition Premium when it acquired the pipeline and other assets?

A.46 No. Without original cost information or information on the depreciated original cost of the pipeline and other assets that were acquired by B&W from the previous owner, Gasco, B&W recorded the purchase price as the cost of the pipeline and did not record any amounts for Goodwill or as an Acquisition Adjustment. In the current case, B&W is treating the amount that it paid for the pipeline as Plant in Service, along with the safety improvements that B&W made to the pipeline after acquiring it.

Q.47 What adjustment have you made for the pipeline cost?

A.47 As shown on Exhibit RCS-1, Schedule 2, I have excluded from Plant in Service and have treated as an Acquisition Adjustment the amount that B&W paid for the pipeline because B&W has failed to provide reliable information on the original cost of the pipeline to the previous owner, Gasco, and has failed to provide the depreciated original cost under the previous owner, Gasco, at the time of the acquisition. This adjustment also reflects that the depreciated original cost under the previous owner, Gasco, at the time of the acquisition was not able to be ascertained with reliability from any other public information that has come to my attention, including Gasco annual reports to the TRA and property tax records that were available from the State of Tennessee. The exclusion of the $2,597,285 acquisition amount leaves a cost of $437,715 for the pipeline, which relates to the pipeline safety improvement amounts that B&W invested in the pipeline after acquiring it.

Q.48 Is there a related adjustment for Accumulated Depreciation?

A.48 Yes. As shown on Exhibit RCS-1, Schedule 2, the Company's per-book Accumulated Depreciation at December 31, 2014 is reduced by $416,052. The Company's adjustment to extend Accumulated Depreciation to the mid-point of the 2016 attrition year is reduced by $152,315, for a total reduction of $568,367 to the amounts of Accumulated Depreciation that B&W reflected in its proposed rate base.

Q.49 What is the net reduction to B&W's requested rate base for the Acquisition Adjustment?

A.49 As shown on Exhibit RCS-1, Schedule 2, line 11, column B, the reduction to Net Plant in Service for the acquisition adjustment is $2,028,918. This is the difference between the reduction to Plant in Service of $2,597,285 and the reduction to Accumulated Depreciation of $568,367.

Q.50 Is there a related adjustment for Depreciation Expense?

A.50 Yes. As shown on Exhibit RCS-1, Schedule 2, line 12, Depreciation Expense is reduced by $101,543.

Q.51 Is B&W being charged by an affiliate for an Operator Fee?

A.51 Yes. B&W during 2014 recorded a total affiliate Operator Fee of $273,000.

Q.52 How much of the affiliated Operator Fee has B&W requested in its proposed cost of service for the pipeline?

A.52 In its application, B&W proposed an adjustment to split the $273,000 affiliated charge for the Operator Fee equally between the gas transportation pipeline and other non-regulated operations, such as oil and gas production, leaving an amount of $136,500 in pipeline operating expense.

Q.53 Has B&W proved the reasonableness of that affiliated charge or of the 50 percent allocation to pipeline operations?

A.53 No. This is an affiliated transaction and thus bears heightened regulatory scrutiny. The burden of proving the reasonableness of these affiliated fees should be on B&W. The

Company has not justified the total affiliated Operator Fee cost or its proposed allocation of half of the $273,000 total cost to pipeline operations.

Q.54 Is the Operator Fee discussed in a contract between Enrema, LLC (an affiliate) and B&W?

A.54 Apparently, yes. The affiliated charge for the Operator Fee apparently relates to an agreement between Enrema, LLC (the "Manager") and B&W Pipeline, LLC ("Company") dated November 2011 and addresses the treating, transportation, compression, delivery, distribution, purchasing and sale of gas, which includes the laying and maintenance of pipelines. The basis for the fee specified in the November 2011 Enrema contract is for B&W to pay Enrema (the "Manager") seven percent of revenues each quarter, and in addition to the Fee, the Company will reimburse the Manager for all of its costs incurred in providing the services, including direct and indirect expenses. The allocation of expenses which are not solely attributable to the Company includes the salary of employees who provide services for the Company and others. The proportion is supposed to be based on personnel time in a typical week and for other costs or expenses another reasonable method mutually agreed between the Company and the Manager. B&W's response to CAPD 1-8, however, indicates that there are provisions in the agreement that are no longer being applied. B&W's response to CAPD 1-8 supplied invoices which indicate that in 2014, invoices from Enrema for a Professional Management Service Flat Monthly Fee of $22,750 per month were being charged to B&W.

Q.55 Please explain your recommended adjustment for the affiliate Operator Fee.

A.55 B&W has not justified the total amount of the $273,000 affiliate Operator Fee or the allocation of the fee to pipeline operations. The Company states in response to CAPD 1-6 which explains how B&W was acquired. As noted in that response, FIR Energy, using funds invested by MI energy, has invested $5.7 million in B&W Pipeline, LLC. FIR Energy has also invested, using funds supplied by MI Energy, $16 million in the larger gas and oil development in Tennessee. Thus, an allocation of less than 50% of the affiliate Operator Fee charge to B&W's pipeline operations would appear to be appropriate for regulatory purposes. If too much of this affiliate charge is included in B&W's revenue requirement, that would result in B&W's regulated pipeline operations subsidizing the MI Energy, FIR Energy, and Enrema non-regulated operations, such as oil and gas production. Using an allocation of 20% (one-fifth of the $273,000 affiliate Operator Fee) to B&W's pipeline operations results in an expense allowance of $54,600 per year and an adjustment to reduce B&W's requested expense by $81,900, as shown on Exhibit RCS-1, Schedule 3.

Q.56 Please explain the adjustment to defer and amortize B&W's certificate costs.

A.56 During the 2014 test year, B&W recorded as expenses, legal and professional fees that were largely related to obtaining B&W's certificate. Those costs benefit more than one period, and indeed having the certificate will benefit B&W throughout its operation. Consequently, the costs should be amortized over a longer period that approximates the period benefitted. As shown on Exhibit RCS-1, Schedule 4, using a 20-year amortization period, results in an annual amortization of $3,719 and an adjustment to decrease the related test year legal and accounting expenses of $74,383 by $70,664.

Q.57 Is there a corresponding adjustment to rate base?

A.57 Yes. I am advised that in Tennessee the regulatory practice is to include unamortized utility assets in rate base. I note that B&W has done this for its unamortized rate case cost. As shown on Exhibit RCS-1, Schedule 4, the average unamortized mid-2016 balance for the certificate related costs of $68,959 is included in rate base. This amount is based on an amortization commencing with mid-January 2015, which is the approximate time of the TRA's granting of B&W's Certificate of Convenience and Necessity ("CCN" or "Certificate") to operate the natural gas pipeline system in Pickett, Morgan and Fentress Counties in Docket No. 13-00151.

Q.58 Please explain what is shown on Exhibit RCS-1, Schedule E.

A.58 Exhibit RCS-1, Schedule E shows the rate design that was presented by B&W in its application and an alternative rate design that uses a combination of fixed and volumetric charges.

Q.59 What rate design was presented in B&W's filing?

A.59 Exhibit RCS-1, Schedule E, page 1, column A, shows the initial rate design that was proposed by B&W, which involved dividing B&W's total claimed revenue requirement of $627,565 (consisting of $101,917 revenue at current rates and a claimed revenue deficiency of $525,648) by 169,861 Mcf of gas transportation throughput volumes, to derive a rate of $3.69 per Mcf, as shown in B&W witness Novak's direct testimony at page 9. This would increase current rates of $0.60 per Mcf to $3.69 per Mcf, an increase of $3.09 per Mcf or 516%.[5]

---

[5] This same percentage increase can also be derived by dividing B&W's claimed revenue deficiency of $525,648 by the $101,917 amount of revenue at current rates that is shown in B&W's filing.

Q.60 Does a requested increase of 516% above existing rates raise concerns about rate shock?

A.60 Yes. An increase of that magnitude raises concerns about rate shock. That level of increase that has been presented in B&W's application is not justified and should not be granted. An additional concern, as I have explained elsewhere in my testimony, is that B&W's pipeline throughput and gas transportation volume are dependent in large part upon the gas that is transported by B&W for a large Navitas customer that has dual fuel capability and could utilize propane instead of natural gas if the transportation rates being charged by B&W render the use of gas less economically viable. Thus, holding B&W's gas transportation rates to reasonable levels would appear to benefit all concerned. Having that one large Navitas customer utilizing natural gas to the fullest extent practical results in the estimated transportation volumes over which B&W's revenue requirement is recovered through the volumetric rates. If that customer were to utilize propane instead of natural gas, B&W's revenue requirement would be spread over smaller transportation volumes, that, other things being equal, would result in higher rates to the remaining customers.

Q.61 Please discuss the recommended rate design.

A.61 As shown on Exhibit RCS-1, Schedule E, page 1, in column C, using the adjusted revenue requirement based on the equity return recommended by CAPD witness Klein and the other adjustments I am recommending, B&W has revenue at current rates of $127,577 and a revenue deficiency of $37,651, and a total revenue requirement of $165,228. Monthly fixed charges of $5,000 for Navitas and $1,440 for B&W's affiliates would produce annual revenue of $77,280, as shown on lines 8-10. The remaining amount of revenue requirement can be included in volumetric charges per Mcf. Using the estimated 2016 gas transportation volumes of 165,178 Mcf and 47,450 Mcf for B&W's transportation of gas to Navitas and to the B&W affiliates, respectively, produces a total estimated 2016 transportation volume of 212,628 Mcf. The volumetric rates were developed using the total estimated 2016 transportation volume of 212,628 Mcf, as shown on lines 11-15, and would produce a charge per Mcf of $0.41. Schedule E includes a proof of revenue at lines 16-18. Having a portion of the revenue requirement recovered via fixed charges helps B&W's revenue stability, and provides B&W with a source of cash flow during the months when gas transportation through the pipeline is at minimal levels.

Q.62 What is shown on Exhibit RCS-1, Schedule E, page 2?

A.62 Exhibit RCS-1, Schedule E, page 2, shows for illustrative purposes a rate design for a total revenue requirement of approximately $365,000. Similar to Schedule E, page 1, monthly fixed charges of $5,000 for Navitas and $1,440 for B&W's affiliates would produce annual revenue of $77,280, as shown on lines 8-10. The remaining amount of revenue requirement can be included in volumetric charges per Mcf. Using the estimated 2016 gas transportation volumes of 165,178 Mcf and 47,450 Mcf for B&W's transportation of gas to Navitas and to the B&W affiliates, respectively, produces a total estimated 2016 transportation volume of 212,628 Mcf. The volumetric rates were developed using the total estimated 2016 transportation volume of 212,628 Mcf, as shown on lines 11-15, of $1.35 per Mcf. Schedule E, page 2, at lines 16-18, also includes a proof of revenue for the illustrative $365,000 annual revenue requirement.

Q.63 Does this complete your testimony?

A.63 Yes.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

Petition of B&W Pipeline, LLC	)	
For an Increase in Rates	)	DOCKET NO. 15-00042

EXHIBIT OF

RALPH C. SMITH

ON BEHALF OF THE TENNESSEE ATTORNEY GENERAL
CONSUMER ADVOCATE AND PROTECTION DIVISION

August 11, 2015

[Resubmitted August 19, 2015]

B & W Pipeline, LLC
Docket No. 15-00042
Exhibit RCS-1
Revenue Requirement and Adjustment Schedules
Accompanying the Direct Testimony of Ralph C. Smith

B & W Pipeline, LLC
Revenue Deficiency
For the 12 Months Ending December 31, 2016

Corrected

Line No.	Description	Per Company Attrition Period		CAPD Adjusted		Difference
1	Rate Base	$ 2,575,326	A/	$ 615,367	E/	$ 1,959,959
2	Net Operating Income (Loss)	$ (265,112)	B/	$ 14,655	F/	$ (279,767)
3	Earned Rate of Return	-10.29%		2.38%		-12.68%
4	Fair Rate of Return	10.12%	C/	8.50%	G/	1.62%
5	Required Net Operating Income	$ 260,537		$ 52,306		$ 208,231
6	**NOI Deficiency (Surplus):**	$ 525,649		$ 37,651		$ 487,998
7	Revenue Conversion Factor	1.000000	D/	1.000000	D/	-
8	**Revenue Deficiency (Surplus)**	$ 525,649		$ 37,651		$ 487,998

Source and Notes

A/ Company Exhibit, Schedule 2.
B/ Company Exhibit, Schedule 3.
C/ Company Exhibit, Schedule 6.
D/ Company is an LLC and income flows to the owner's personal tax returns, and the resulting Revenue Conversion Factor = 1.000000.
E/ Exhibit __(RCS-1), Schedule B
F/ Exhibit __(RCS-1), Schedule C
G/ Exhibit __(RCS-1), Schedule D. Return recommendation is sponsored by CAPD witness Klein.

B & W Pipeline
Rate Base
For the 12 Months Ending December 31, 2016

Line No.	Description	Per Company for Attrition Period (A)	CAPD Adjustments (B)	CAPD Adjusted (C)
	Plant in Service:			
1	Intangible Plant (303)	$ 88,450		$ 88,450
2	Land & Land Rights (374)	$ 20,100		$ 20,100
3	Structures & Improvements (375)	$ 11,292		$ 11,292
4	Mains (376)	$ 3,035,000	$ (2,597,285) A/	$ 437,715 A/
5	**Total Plant in Service**	**$ 3,154,842**	**$ (2,597,285)**	$ 557,557
6	Less Accumulated Depreciation	$ (633,516)	$ 568,367 A/	$ (65,149) A/
7	**Net Plant in Service**	**$ 2,521,326**	**$ (2,028,918)**	**$ 492,408**
	Other Rate Base Items:			
8	Deferred Rate Case Expense	$ 54,000		$ 54,000
9	Deferred Certificate Cost		$ 68,959 B/	$ 68,959 B/
10	**Total Other Rate Base Items**	**$ 54,000**	**$ 68,959**	**$ 122,959**
11	**Total Rate Basae**	**$ 2,575,326**	**$ (1,959,959)**	**$ 615,367**

Source and Notes
Col. A: Company Exhibit, Schedule 2.
Col. B: See referenced adjustment schedule
Col. C: Col. A + Col.B
A/ Exhibit RCS-1, Schedule 2
B/ Exhibit RCS-1, Schedule 4

B & W Pipeline
Net Operating Income
For the 12 Months Ending December 31, 2016

Line No.	Description	Attrition Period		CAPD Adjustments	CAPD Adjusted
	Revenues:				
1	Transportation Revenue (400)	$ 101,917		$ 25,660 A/	$ 127,577 A/
2	**Total Revenue**	**$ 101,917**	$ -	**$ 25,660**	**$ 127,577**
	Expenses:				
	Operation Expense (401)				
3	Operator Fee	$ 136,500		$ (81,900) C/	$ 54,600 C/
4	Bank Fee	$ 95			$ 95
5	Dues & Subscriptions	$ 12,930			$ 12,930
6	Right of Way Payments	$ 67			$ 67
7	Electric Expense	$ 881			$ 881
8	Chart Service Expense	$ 3,212			$ 3,212
9	Materials Expense	$ 274			$ 274
10	Road Maintenance Repair	$ 3,350			$ 3,350
11	Professional Services	$ 86,383		$ (70,664) D/	$ 15,719
12	**Total Operation Expense (401)**	**$ 243,692**	$ -	**$ (152,564)**	**$ 91,128**
	Maintenance Expense (402)				
13	Equipment Maintenance Service	$ 980			$ 980
14	Equipment Repair Service	$ 1,861			$ 1,861
15	Line Locate	$ 1,145			$ 1,145
16	Disassemble Service	$ 163			$ 163
17	**Total Maintenance Expense**	**$ 4,149**	$ -	**$ -**	**$ 4,149**
	Other Expenses				
18	Depreciation Expense (403)	$ 118,656		$ (101,543) B/	$ 17,113 B/
19	Taxes Opther Than Income (408.1)	$ 532			$ 532
20	**Total Other Expenses**	**$ 119,188**	$ -	**$ (101,543)**	**$ 17,645**
21	**Total Expenses**	**$ 367,029**	$ -	**$ (254,107)**	$ 112,922
22	**Income (Loss) from Non-Utility Operations (417)**	$ -	$ -		$ -
23	**Net Operating Income (Loss)**	**$ (265,112)**	$ -	**$ 279,767**	**$ 14,655**

Notes And Source

Col.A: Company Exhibit, Schedule 2, "Attrition Period" amounts
- **A/** See Exhibit __(RCS-1), Schedule 1
- **B/** See Exhibit __(RCS-1), Schedule 2
- **C/** See Exhibit __(RCS-1), Schedule 3
- **D/** See Exhibit __(RCS-1), Schedule 4

B & W Pipeline
Proposed Return on Equity
For the 12 Months Ending December 31, 2016

Exhibit __(RCS - 1)
Schedule D

Line No.	Description	TRA Docket	Approved Equity Return	
	I. Utility Proposed			
1	Atmos Energy Company	12-00064	10.10%	
2	Chattanooga Gas Company	09-00183	10.05%	
3	Piedmont Natural Gas Company	11-00144	10.20%	
4	**Average**		**10.12%**	
			Approved Overall Cost of Capital	
	II. Per CAPD			
	Compare Overall Cost of Capital Approved by TRA:			
5	Atmos Energy Company	12-00064	8.28%	A/
6	Chattanooga Gas Company	09-00183	7.41%	A/
7	Piedmont Natural Gas Company	11-00144	7.98%	A/
8	**Average**		**7.89%**	
9	CAPD Recommendation		8.50%	B/
10	Difference between CAPD Recommendation and Utility Request		-1.62%	

Notes and Source
Lines 1-4: Company Exhibit, Schedule 6.
A/ See respective TRA Orders for the referenced TRA Dockets.
B/ Per recommendation of CAPD witness Christopher Klein

B & W Pipeline
Revenue at Current Rates
For the 12 Months Ending December 31, 2016

Exhibit __(RCS - 1)
Schedule 1

Line No.	Description	Per Company (A)		CAPD Adjustments (B)	CAPD Adjusted (C)	
	Estimated Throughput (in Mcf)					
1	Navitas Transportation	122,411	A/	42,767	165,178	B/
2	B&W Pipeline Intercompany Transportation	47,450	A/	-	47,450	
3	Total Throughput Estimated for 2016	169,861	A/	42,767	212,628	
	Projected Revenue at Current Rates					
4	Current Transportation Rate	$ 0.60	A/	$ 0.60	$ 0.60	
5	Transportation Revenue (400) at Current Rates	$ 101,917	A/	$ 25,660	$ 127,577	

Notes and Source

A/ Company Exhibit, Schedule 4.
B/ Navitas response to TRA Data Requests Nos. 1 and 2, Exhibit A, 2016 expected Mcf sales from from gas supplied by the B&W Pipeline
Col.B: Difference between columns C and A

B & W Pipeline
Acquisition Adjustment - Adjust Plant for Original Cost
At December 31, 2014

Exhibit __(RCS - 1)
Schedule 2

Line No.	Description	Per Company (A)		CAPD Adjustments (B)	CAPD Adjusted (C)	
	I. Plant in Service					
1	Intangible Plant (303)	$ 88,450	A/			
2	Land & Land Rights (374)	$ 20,100	A/			
3	Structures & Improvements (375)	$ 11,292	A/			
4	Mains (376)	$ 3,035,000	A/	$ (2,597,285)	$ 437,715	C/
5	**Total Plant in Service**	$ 3,154,842		$ (2,597,285)	$ 437,715	
	II. Accumulated Depreciation					
6	127181 · Pipeline	$ (416,052)	C/	$ 416,052	0	C/
7	127182 · Pipeline Safety Improvements	$ (39,480)	C/	$ -	$ (39,480)	C/
8	Total Accumulated Depreciation per Trial Balance	$ (455,532)	A/	$ 416,052	$ (39,480)	
9	**Company Pro Forma Adjustment to Midpoint of Attrition Year**	$ (177,984)	B/	$ 152,315	$ (25,669)	E/
10	**Accumulated Depreciation**	$ (633,516)	B/	$ 568,367	$ (65,149)	
	III. Net Plant in Service					
11	**Net Plant in Service**	$ 2,521,327		$ (2,028,918)	$ 372,566	
	IV. Depreciation Expense					
12	Depreciation Expense	$ 118,656		$ (101,543)	$ 17,113	

Notes and Source

A/ Company Exhibit, Schedule 2, Trial Balance and Adjusted Test Period amounts
B/ Company Exhibit, Schedule 2, Attrition Period amounts
C/ MFR Attachment 10-2 Trial Balance for 2014

Line No.	12000 · FIXED ASSETS (NET):12600 · DEPRECIABLE:12610 · DEPRECIABLE:12618 · Plant, Machinery and Industrial:		Trial Balance Amount (D)	Original Cost (E)	Acquisition Adjustment (F)	
13	126181 · Pipeline	#	$ 2,597,285		$ 2,597,285	D/
14	126182 · Pipeline Safety Improv. (2012)	#	$ 187,418	$ 187,418		
15	126187 · Pipeline Safety Improv. (2013)		$ 241,275	$ 241,275		
16	126188 · Pipeline Safety Improv. (2014)		$ 9,022	$ 9,022		
17	Total Mains (376)		$ 3,035,000	$ 437,715	$ 2,597,285	
	12000 · FIXED ASSETS (NET):12700 · ACCUMULATED DEPRECIATION:12710 · ACCUMULATED DEPRECIATION:12718 · Plant, Machinery and Industrial:					
18	**127181 · Pipeline**		$ (416,052)		$ (416,052)	D/
19	**127182 · Pipeline Safety Improvements**		$ (39,480)	$ (39,480)		
20	Total Accumulated Depreciation		$ (455,532)	$ (39,480)	$ (416,052)	

Line No.	50000 · EXPENSES:52000 · OVERHEAD EXPENSES:52600 · DEPRECIATIONS & AMORTIZATIONS:52610 · DEPRECIATIONS:	Amount		Ratio (G)		Depreciation Expense Allowance (H)
21	52611 · Depreciations	$ 118,656		14.4%	E/	$ 17,113
22	1.5 times Depreciation Amount (per Company)	$ 177,984	B/			

D/ Amounts that Company has been unable to substantiate as original cost amounts under prior owner are being removed from Plant and treated as Acquisition Adjustment amounts that are not included in rate base

E/ Ratio of allowed Pipeline Plant to total Company claimed Pipeline Plant:

Line No.		Amount (I)		Accumulated Depreciation Pro Forma per Company (J)		Accumulated Depreciation Pro Forma per CAPD (K)
23	Allowed	$ 437,715				
24	Claimed by Company	$ 3,035,000				
25	Ratio	14.4%	x	$ (177,984)	=	$ (25,669)

B & W Pipeline
Operator Fee Expense Allocation
For the 12 Months Ending December 31, 2016

Exhibit __(RCS - 1)
Schedule 3

Line No.	Description	Per Company (A)		CAPD Adjustments (B)	CAPD Adjusted (C)	
	Operator Fee					
1	Total Operator Fee	$ 273,000	A/	-	$ 273,000	
2	Allocation of Operator Fee to Pipeline	50%	A/		20%	B/
3	Operator Fee Allocated to Pipeline Operations	$ 136,500	A/	(81,900)	$ 54,600	

Notes and Source

A/ Company Exhibit, Schedule 2.
B/ See testimony for explanation of recommended allocation
Col.B: Difference between columns C and A

Exhibit __(RCS - 1)
Schedule 4

B & W Pipeline
Professional Services Related to Obtaining Certificate
For the 12 Months Ending December 31, 2016

Line No.	Description	Per Company (A)	CAPD Adjustments (B)	CAPD Adjusted (C)
	Professional Services Related to Obtaining Certificate			
	Professional Services for Obtaining Certificate:			
1	Legal Fees	$ 59,003 A/		59,003 A/
2	Accounting Fees	$ 15,380 B/		15,380 B/
3	Total Expenses in 2014	$ 74,383		$ 74,383
4	Recommended amortization period in years			20 C/
5	Test Year Expense	$ 74,383	(70,664)	$ 3,719
	Rate Base Amount of Unamortized Deferred Cost			
6	Addition to Rate Base for Deferred Cost		$ 68,959 D/	$ 68,959 D/

Notes and Source

A/ Company's response to CAPD 1-9, CAPD 2-23 and CAPD 2-24 and MFR Attachment 10-2
B/ Company's response to CAPD 1-9 and CAPD 2-24 and MFR Attachment 10-2
C/ See testimony for explanation of recommended amortization period
Col.B: Difference between columns C and A
D/ Calculation of unamortized balance at mid-point of 2016 calculated below:

7	Initial balance (expense amounts recorded in 2014 test year)		$ 74,383
	Begin amortization in January 2015 (date of CCN Order is January 8, 2015 in Docket No. 13-00151)		
8	Amortization in 2015, months	11.5	
9	Amortization to mid-point of 2016	6	
10	Total months of amortization through mid-point of 2016	17.5	
11	Monthly amortization	$ 310	
12	Amortization through mid-point of 2016		$ 5,424
13	Average unamortized balance through mid-point of 2016		$ 68,959 D/

B & W Pipeline
Recommended Rate Design
For the 12 Months Ending December 31, 2016
Using CAPD Adjusted Revenue Requirement

Exhibit __(RCS - 1)
Schedule E
Page 1 of 2
Corrected

Line No.	Description	Per Company (A)		CAPD Adjustments (B)	CAPD Adjusted (C)	
	I. Revenues:					
1	Transportation Revenue (400) at Current Rates	$ 101,917	A/	$ 25,660	$ 127,577	
2	Revenue Deficiency	$ 525,648	A/	$ (487,997)	$ 37,651	
3	Transportation Revenue (400) at Proposed Rates	$ 627,565	A/	$ (462,337)	$ **165,228**	
	II. Rate Design:					
4	**A. Monthly Fixed Charges:**					
5	Fixed Charges - Navitas Transportation				$ 5,000	B/
6	Fixed Charges - InterCompany Transportation				$ 1,440	G/
7	Total Monthly Fixed Charges				$ 6,440	
	B. Annual Revenue Requirement Recovery From Fixed Charges:					
8	Fixed Charges - Navitas Transportation				$ 60,000	C/
9	Fixed Charges - InterCompany Transportation				$ 17,280	C/
10	Total Fixed Charge Based Revenue Requirement	$ -		$ -	$ **77,280**	C/
	C. Revenue Requirement Recovery From Volumetric Charges:					
11	**Revenue Requirement for Volumetric Charges**	$ 627,565			$ 87,948	D/
	Estimated Throughput (in Mcf):					
12	Navitas Transportation	122,411	E/		165,178	E/
13	B&W Pipeline Intercompany Transportation	47,450	E/		47,450	E/
14	Total Throughput Estimated for 2016	169,861	E/		212,628	E/
15	**Volumetric Rate per Mcf**	$ 3.69	F/		$ 0.41	F/

Line No.	**III. Proof of Revenue**	**Fixed Charges** (D)	**Volumetric (Per Mcf) Charges** (E)	**Total Revenue** (F)
16	Navitas Transportation	$ 60,000	$ 68,322	$ 128,322
17	B&W Pipeline Intercompany Transportation	$ 17,280	$ 19,626	$ 36,906
18	Total Revenue Requirement	$ 77,280	$ **87,948**	$ **165,228**

Notes And Source

A/ Per Company, Novak Direct Testimony at page 9
Note that the 100% volumetric recovery is apparently based on the current rate structure.
The cited B&W Testimony indicates that a final rate design would be presented before hearings.
B/ Based on discussions with B&W Pipeline and Navitas
C/ Monthly amounts of fixed charges times 12 months
D/ Line 3 - Line 10
E/ See summary of throughput on Exhibit __(RCS-1), Schedule CAPD-1
F/ Line 11 / Line 15
G/ B&W Intercompany Fixed Charge approximately proportional to estimated 2016 throughput:

Line No.	**Estimated Throughput (in Mcf):**	(Mcf) (G)	Percent (H)	Monthly Fixed Charge (I)	Percent (J)
19	Navitas Transportation	165,178	78%	$ 5,000	78%
20	B&W Pipeline Intercompany Transportation	47,450	22%	$ 1,440	22%
21	Total Throughput Estimated for 2016	212,628	100%	$ 6,440	100%

B & W Pipeline
Recommended Rate Design
For the 12 Months Ending December 31, 2016
Using An Illustrative Revenue Requirement of Approximately $365,000

Line No.	Description	Per Company (A)		CAPD Adjustments (B)	CAPD Adjusted (C)	
	I. Revenues:					
1	Transportation Revenue (400) at Current Rates	$ 101,917	A/	$ 25,660	$ 127,577	
2	Revenue Deficiency	$ 525,648	A/	$ (288,225)	$ 237,423	
3	Transportation Revenue (400) at Proposed Rates	**$ 627,565**	A/	**$ (262,565)**	**$ 365,000**	
	II. Rate Design:					
4	**A. Monthly Fixed Charges:**					
5	Fixed Charges - Navitas Transportation				$ 5,000	B/
6	Fixed Charges - InterCompany Transportation				$ 1,440	G/
7	Total Monthly Fixed Charges				$ 6,440	
	B. Annual Revenue Requirement Recovery From Fixed Charges:					
8	Fixed Charges - Navitas Transportation				$ 60,000	C/
9	Fixed Charges - InterCompany Transportation				$ 17,280	C/
10	Total Fixed Charge Based Revenue Requirement	$ -		$ -	**$ 77,280**	C/
	C. Revenue Requirement Recovery From Volumetric Charges:					
11	**Revenue Requirement for Volumetric Charges**	$ 627,565			$ 287,720	D/
	Estimated Throughput (in Mcf):					
12	Navitas Transportation	122,411	E/		165,178	E/
13	B&W Pipeline Intercompany Transportation	47,450	E/		47,450	E/
14	Total Throughput Estimated for 2016	169,861	E/		212,628	E/
15	**Volumetric Rate per Mcf**	$ 3.69	F/		$ 1.35	F/

Line No.		Fixed Charges (D)	Volumetric (Per Mcf) Charges (E)	Total Revenue (F)
	III. Proof of Revenue			
16	Navitas Transportation	$ 60,000	$ 223,512	$ 283,512
17	B&W Pipeline Intercompany Transportation	$ 17,280	$ 64,208	$ 81,488
18	Total Revenue Requirement	**$ 77,280**	**$ 287,720**	**$ 365,000**

Notes And Source

- **A/** Per Company, Novak Direct Testimony at page 9
  Note that the 100% volumetric recovery is apparently based on the current rate structure.
  The cited B&W Testimony indicates that a final rate design would be presented before hearings.
- **B/** Based on discussions with B&W Pipeline and Navitas
- **C/** Monthly amounts of fixed charges times 12 months
- **D/** Line 3 - Line 10
- **E/** See summary of natural gas transportation volumes for 2016 on Exhibit __(RCS-1), Schedule CAPD-1
- **F/** Line 11 / Line 15
- **G/** B&W Intercompany Fixed Charge approximately proportional to estimated 2016 throughput:

Line No.	**Estimated Throughput (in Mcf):**	(Mcf) (G)	Percent (H)	Monthly Fixed Charge (I)	Percent (J)
19	Navitas Transportation	165,178	78%	$ 5,000	78%
20	B&W Pipeline Intercompany Transportation	47,450	22%	$ 1,440	22%
21	Total Throughput Estimated for 2016	212,628	100%	$ 6,440	100%

Appendix RCS-1

QUALIFICATIONS OF RALPH C. SMITH

Accomplishments

Mr. Smith's professional credentials include being a Certified Financial Planner™ professional, a Certified Rate of Return Analyst, a licensed Certified Public Accountant and attorney. He functions as project manager on consulting projects involving utility regulation, regulatory policy and ratemaking and utility management. His involvement in public utility regulation has included project management and in-depth analyses of numerous issues involving telephone, electric, gas, and water and sewer utilities.

Mr. Smith has performed work in the field of utility regulation on behalf of industry, public service commission staffs, state attorney generals, municipalities, and consumer groups concerning regulatory matters before regulatory agencies in Alabama, Alaska, Arizona, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, New Jersey, New Mexico, New York, Nevada, North Carolina, North Dakota, Ohio, Pennsylvania, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Washington, Washington DC, West Virginia, Canada, Federal Energy Regulatory Commission and various state and federal courts of law. He has presented expert testimony in regulatory hearings on behalf of utility commission staffs and intervenors on several occasions.

Project manager in Larkin & Associates' review, on behalf of the Georgia Commission Staff, of the budget and planning activities of Georgia Power Company; supervised 13 professionals; coordinated over 200 interviews with Company budget center managers and executives; organized and edited voluminous audit report; presented testimony before the Commission. Functional areas covered included fossil plant O&M, headquarters and district operations, internal audit, legal, affiliated transactions, and responsibility reporting. All of our findings and recommendations were accepted by the Commission.

Key team member in the firm's management audit of the Anchorage Water and Wastewater Utility on behalf of the Alaska Commission Staff, which assessed the effectiveness of the Utility's operations in several areas; responsible for in-depth investigation and report writing in areas involving information systems, finance and accounting, affiliated relationships and transactions, and use of outside contractors. Testified before the Alaska Commission concerning certain areas of the audit report. AWWU concurred with each of Mr. Smith's 40 plus recommendations for improvement.

Co-consultant in the analysis of the issues surrounding gas transportation performed for the law firm of Cravath, Swaine & Moore in conjunction with the case of Reynolds Metals Co. vs. the Columbia Gas System, Inc.; drafted in-depth report concerning the regulatory treatment at both state and federal levels of issues such as flexible pricing and mandatory gas transportation.

Lead consultant and expert witness in the analysis of the rate increase request of the City of Austin - Electric Utility on behalf of the residential consumers. Among the numerous ratemaking issues addressed were the economies of the Utility's employment of outside services; provided both written and oral testimony outlining recommendations and their bases. Most of Mr. Smith's recommendations were adopted by the City Council and Utility in a settlement.

Key team member performing an analysis of the rate stabilization plan submitted by the Southern Bell Telephone & Telegraph Company to the Florida PSC; performed comprehensive analysis of the Company's projections and budgets which were used as the basis for establishing rates.

Lead consultant in analyzing Southwestern Bell Telephone separations in Missouri; sponsored the complex technical analysis and calculations upon which the firm's testimony in that case was based. He has also assisted in analyzing changes in depreciation methodology for setting telephone rates.

Lead consultant in the review of gas cost recovery reconciliation applications of Michigan Gas Utilities Company, Michigan Consolidated Gas Company, and Consumers Power Company. Drafted recommendations regarding the appropriate rate of interest to be applied to any over or under collections and the proper procedures and allocation methodology to be used to distribute any refunds to customer classes.

Lead consultant in the review of Consumers Power Company's gas cost recovery refund plan. Addressed appropriate interest rate and compounding procedures and proper allocation methodology.

Project manager in the review of the request by Central Maine Power Company for an increase in rates. The major area addressed was the propriety of the Company's ratemaking attrition adjustment in relation to its corporate budgets and projections.

Project manager in an engagement designed to address the impacts of the Tax Reform Act of 1986 on gas distribution utility operations of the Northern States Power Company. Analyzed the reduction in the corporate tax rate, uncollectibles reserve, ACRS, unbilled revenues, customer advances, CIAC, and timing of TRA-related impacts associated with the Company's tax liability.

Project manager and expert witness in the determination of the impacts of the Tax Reform Act of 1986 on the operations of Connecticut Natural Gas Company on behalf of the Connecticut Department of Public Utility Control - Prosecutorial Division, Connecticut Attorney General, and Connecticut Department of Consumer Counsel.

Lead Consultant for The Minnesota Department of Public Service ("DPS") to review the Minnesota Incentive Plan ("Incentive Plan") proposal presented by Northwestern Bell Telephone Company ("NWB") doing business as U S West Communications ("USWC"). Objective was to express an opinion as to whether current rates addressed by the plan were appropriate from a Minnesota intrastate revenue requirements and accounting perspective, and to assist in developing recommended modifications to NWB's proposed Plan.

Performed a variety of analytical and review tasks related to our work effort on this project. Obtained and reviewed data and performed other procedures as necessary (1) to obtain an understanding of the Company's Incentive Plan filing package as it relates to rate base, operating income, revenue requirements, and plan operation, and (2) to formulate an opinion concerning the reasonableness of current rates and of amounts included within the Company's Incentive Plan filing. These procedures included requesting and reviewing extensive discovery, visiting the Company's offices to review data, issuing follow-up information requests in many instances, telephone and on-site discussions with Company representatives, and frequent discussions with counsel and DPS Staff assigned to the project.

Lead Consultant in the regulatory analysis of Jersey Central Power & Light Company for the Department of the Public Advocate, Division of Rate Counsel. Tasks performed included on-site review and audit of Company, identification and analysis of specific issues, preparation of data requests, testimony, and cross examination questions. Testified in Hearings.

Assisted the NARUC Committee on Management Analysis with drafting the Consultant Standards for Management Audits.

Presented training seminars covering public utility accounting, tax reform, ratemaking, affiliated transaction auditing, rate case management, and regulatory policy in Maine, Georgia, Kentucky, and Pennsylvania. Seminars were presented to commission staffs and consumer interest groups.

Previous Positions

With Larkin, Chapski and Co., the predecessor firm to Larkin & Associates, was involved primarily in utility regulatory consulting, and also in tax planning and tax research for businesses and individuals, tax return preparation and review, and independent audit, review and preparation of financial statements.

Installed computerized accounting system for a realty management firm.

Education

Bachelor of Science in Administration in Accounting, with distinction, University of Michigan, Dearborn, 1979.

Master of Science in Taxation, Walsh College, Michigan, 1981. Master's thesis dealt with investment tax credit and property tax on various assets.

Juris Doctor, cum laude, Wayne State University Law School, Detroit, Michigan, 1986. Recipient of American Jurisprudence Award for academic excellence.

Continuing education required to maintain CPA license and CFP® certificate.

Passed all parts of CPA examination in first sitting, 1979. Received CPA certificate in 1981 and Certified Financial Planning certificate in 1983. Admitted to Michigan and Federal bars in 1986.

Michigan Bar Association.

American Bar Association, sections on public utility law and taxation.

Partial list of utility cases participated in:

79-228-EL-FAC	Cincinnati Gas & Electric Company (Ohio PUC)
79-231-EL-FAC	Cleveland Electric Illuminating Company (Ohio PUC)
79-535-EL-AIR	East Ohio Gas Company (Ohio PUC)
80-235-EL-FAC	Ohio Edison Company (Ohio PUC)
80-240-EL-FAC	Cleveland Electric Illuminating Company (Ohio PUC)
U-1933*	Tucson Electric Power Company (Arizona Corp. Commission)
U-6794	Michigan Consolidated Gas Co. --16 Refunds (Michigan PSC)
81-0035TP	Southern Bell Telephone Company (Florida PSC)
81-0095TP	General Telephone Company of Florida (Florida PSC)
81-308-EL-EFC	Dayton Power & Light Co.- Fuel Adjustment Clause (Ohio PUC)
810136-EU	Gulf Power Company (Florida PSC)
GR-81-342	Northern States Power Co. -- E-002/Minnesota (Minnesota PUC)
Tr-81-208	Southwestern Bell Telephone Company (Missouri PSC))
U-6949	Detroit Edison Company (Michigan PSC)
8400	East Kentucky Power Cooperative, Inc. (Kentucky PSC)
18328	Alabama Gas Corporation (Alabama PSC)
18416	Alabama Power Company (Alabama PSC)
820100-EU	Florida Power Corporation (Florida PSC)
8624	Kentucky Utilities (Kentucky PSC)
8648	East Kentucky Power Cooperative, Inc. (Kentucky PSC)
U-7236	Detroit Edison - Burlington Northern Refund (Michigan PSC)
U6633-R	Detroit Edison - MRCS Program (Michigan PSC)
U-6797-R	Consumers Power Company -MRCS Program (Michigan PSC)
U-5510-R	Consumers Power Company - Energy conservation Finance Program (Michigan PSC)
82-240E	South Carolina Electric & Gas Company (South Carolina PSC)
7350	Generic Working Capital Hearing (Michigan PSC)
RH-1-83	Westcoast Transmission Co., (National Energy Board of Canada)
820294-TP	Southern Bell Telephone & Telegraph Co. (Florida PSC)
82-165-EL-EFC (Subfile A)	Toledo Edison Company(Ohio PUC)
82-168-EL-EFC	Cleveland Electric Illuminating Company (Ohio PUC)
830012-EU	Tampa Electric Company (Florida PSC)
U-7065	The Detroit Edison Company - Fermi II (Michigan PSC)
8738	Columbia Gas of Kentucky, Inc. (Kentucky PSC)
ER-83-206	Arkansas Power & Light Company (Missouri PSC)
U-4758	The Detroit Edison Company – Refunds (Michigan PSC)
8836	Kentucky American Water Company (Kentucky PSC)
8839	Western Kentucky Gas Company (Kentucky PSC)
83-07-15	Connecticut Light & Power Co. (Connecticut DPU)
81-0485-WS	Palm Coast Utility Corporation (Florida PSC)
U-7650	Consumers Power Co. (Michigan PSC)
83-662	Continental Telephone Company of California, (Nevada PSC)
U-6488-R	Detroit Edison Co., FAC & PIPAC Reconciliation (Michigan PSC)
U-15684	Louisiana Power & Light Company (Louisiana PSC)
7395 & U-7397	Campaign Ballot Proposals (Michigan PSC)
820013-WS	Seacoast Utilities (Florida PSC)
U-7660	Detroit Edison Company (Michigan PSC)
83-1039	CP National Corporation (Nevada PSC)
U-7802	Michigan Gas Utilities Company (Michigan PSC)
83-1226	Sierra Pacific Power Company (Nevada PSC)
830465-EI	Florida Power & Light Company (Florida PSC)
U-7777	Michigan Consolidated Gas Company (Michigan PSC)
U-7779	Consumers Power Company (Michigan PSC)

U-7480-R	Michigan Consolidated Gas Company (Michigan PSC)
U-7488-R	Consumers Power Company – Gas (Michigan PSC)
U-7484-R	Michigan Gas Utilities Company (Michigan PSC)
U-7550-R	Detroit Edison Company (Michigan PSC)
U-7477-R**	Indiana & Michigan Electric Company (Michigan PSC)
18978	Continental Telephone Co. of the South Alabama (Alabama PSC)
R-842583	Duquesne Light Company (Pennsylvania PUC)
R-842740	Pennsylvania Power Company (Pennsylvania PUC)
850050-EI	Tampa Electric Company (Florida PSC)
16091	Louisiana Power & Light Company (Louisiana PSC)
19297	Continental Telephone Co. of the South Alabama (Alabama PSC)
76-18788AA &76-18793AA	Detroit Edison - Refund - Appeal of U-4807 (Ingham County, Michigan Circuit Court)
85-53476AA & 85-534785AA	Detroit Edison Refund - Appeal of U-4758 (Ingham County, Michigan Circuit Court)
U-8091/U-8239	Consumers Power Company - Gas Refunds (Michigan PSC)
TR-85-179**	United Telephone Company of Missouri (Missouri PSC)
85-212	Central Maine Power Company (Maine PSC)
ER-85646001 & ER-85647001	New England Power Company (FERC)
850782-EI & 850783-EI	Florida Power & Light Company (Florida PSC)
R-860378	Duquesne Light Company (Pennsylvania PUC)
R-850267	Pennsylvania Power Company (Pennsylvania PUC)
851007-WU & 840419-SU	Florida Cities Water Company (Florida PSC)
G-002/GR-86-160	Northern States Power Company (Minnesota PSC)
7195 (Interim)	Gulf States Utilities Company (Texas PUC)
87-01-03	Connecticut Natural Gas Company (Connecticut PUC))
87-01-02	Southern New England Telephone Company (Connecticut Department of Public Utility Control)
3673-	Georgia Power Company (Georgia PSC)
29484	Long Island Lighting Co. (New York Dept. of Public Service)
U-8924	Consumers Power Company – Gas (Michigan PSC)
Docket No. 1	Austin Electric Utility (City of Austin, Texas)
Docket E-2, Sub 527	Carolina Power & Light Company (North Carolina PUC)
870853	Pennsylvania Gas and Water Company (Pennsylvania PUC)
880069**	Southern Bell Telephone Company (Florida PSC)
U-1954-88-102 T E-1032-88-102	Citizens Utilities Rural Company, Inc. & Citizens Utilities Company, Kingman Telephone Division (Arizona CC)
89-0033	Illinois Bell Telephone Company (Illinois CC)
U-89-2688-T	Puget Sound Power & Light Company (Washington UTC))
R-891364	Philadelphia Electric Company (Pennsylvania PUC)
F.C. 889	Potomac Electric Power Company (District of Columbia PSC)
Case No. 88/546*	Niagara Mohawk Power Corporation, et al Plaintiffs, v. Gulf+Western, Inc. et al, defendants (Supreme Court County of Onondaga, State of New York)
87-11628*	Duquesne Light Company, et al, plaintiffs, against Gulf+ Western, Inc. et al, defendants (Court of the Common Pleas of Allegheny County, Pennsylvania Civil Division)
890319-EI	Florida Power & Light Company (Florida PSC)
891345-EI	Gulf Power Company (Florida PSC)
ER 8811 0912J	Jersey Central Power & Light Company (BPU)
6531	Hawaiian Electric Company (Hawaii PUCs)

R0901595	Equitable Gas Company (Pennsylvania Consumer Counsel)
90-10	Artesian Water Company (Delaware PSC)
89-12-05	Southern New England Telephone Company (Connecticut PUC)
900329-WS	Southern States Utilities, Inc. (Florida PSC)
90-12-018	Southern California Edison Company (California PUC)
90-E-1185	Long Island Lighting Company (New York DPS)
R-911966	Pennsylvania Gas & Water Company (Pennsylvania PUC)
I.90-07-037, Phase II	(Investigation of OPEBs) Department of the Navy and all Other Federal Executive Agencies (California PUC)
U-1551-90-322	Southwest Gas Corporation (Arizona CC)
U-1656-91-134	Sun City Water Company (Arizona RUCO)
U-2013-91-133	Havasu Water Company (Arizona RUCO)
91-174***	Central Maine Power Company (Department of the Navy and all Other Federal Executive Agencies)
U-1551-89-102 & U-1551-89-103	Southwest Gas Corporation - Rebuttal and PGA Audit (Arizona Corporation Commission)
Docket No. 6998	Hawaiian Electric Company (Hawaii PUC)
TC-91-040A and TC-91-040B	Intrastate Access Charge Methodology, Pool and Rates Local Exchange Carriers Association and South Dakota Independent Telephone Coalition
9911030-WS & 911-67-WS	General Development Utilities - Port Malabar and West Coast Divisions (Florida PSC)
922180	The Peoples Natural Gas Company (Pennsylvania PUC)
7233 and 7243	Hawaiian Nonpension Postretirement Benefits (Hawaiian PUC)
R-00922314 & M-920313C006	Metropolitan Edison Company (Pennsylvania PUC)
R00922428	Pennsylvania American Water Company (Pennsylvania PUC)
E-1032-92-083 & U-1656-92-183	Citizens Utilities Company, Agua Fria Water Division (Arizona Corporation Commission)
92-09-19	Southern New England Telephone Company (Connecticut PUC)
E-1032-92-073	Citizens Utilities Company (Electric Division), (Arizona CC)
UE-92-1262	Puget Sound Power and Light Company (Washington UTC))
92-345	Central Maine Power Company (Maine PUC)
R-932667	Pennsylvania Gas & Water Company (Pennsylvania PUC)
U-93-60**	Matanuska Telephone Association, Inc. (Alaska PUC)
U-93-50**	Anchorage Telephone Utility (Alaska PUC)
U-93-64	PTI Communications (Alaska PUC)
7700	Hawaiian Electric Company, Inc. (Hawaii PUC)
E-1032-93-111 & U-1032-93-193	Citizens Utilities Company - Gas Division (Arizona Corporation Commission)
R-00932670	Pennsylvania American Water Company (Pennsylvania PUC)
U-1514-93-169/ E-1032-93-169	Sale of Assets CC&N from Contel of the West, Inc. to Citizens Utilities Company (Arizona Corporation Commission)
7766	Hawaiian Electric Company, Inc. (Hawaii PUC)
93-2006- GA-AIR*	The East Ohio Gas Company (Ohio PUC)
94-E-0334	Consolidated Edison Company (New York DPS)
94-0270	Inter-State Water Company (Illinois Commerce Commission)
94-0097	Citizens Utilities Company, Kauai Electric Division (Hawaii PUC)
PU-314-94-688	Application for Transfer of Local Exchanges (North Dakota PSC)
94-12-005-Phase I	Pacific Gas & Electric Company (California PUC)
R-953297	UGI Utilities, Inc. - Gas Division (Pennsylvania PUC)
95-03-01	Southern New England Telephone Company (Connecticut PUC)
95-0342	Consumer Illinois Water, Kankakee Water District (Illinois CC)
94-996-EL-AIR	Ohio Power Company (Ohio PUC)
95-1000-E	South Carolina Electric & Gas Company (South Carolina PSC)

Non-Docketed Staff Investigation	Citizens Utility Company - Arizona Telephone Operations (Arizona Corporation Commission)
E-1032-95-473	Citizens Utility Co. - Northern Arizona Gas Division (Arizona CC)
E-1032-95-433	Citizens Utility Co. - Arizona Electric Division (Arizona CC)
	Collaborative Ratemaking Process Columbia Gas of Pennsylvania (Pennsylvania PUC)
GR-96-285	Missouri Gas Energy (Missouri PSC)
94-10-45	Southern New England Telephone Company (Connecticut PUC)
A.96-08-001 et al.	California Utilities' Applications to Identify Sunk Costs of Non-Nuclear Generation Assets, & Transition Costs for Electric Utility Restructuring, & Consolidated Proceedings (California PUC)
96-324	Bell Atlantic - Delaware, Inc. (Delaware PSC)
96-08-070, et al.	Pacific Gas & Electric Co., Southern California Edison Co. and San Diego Gas & Electric Company (California PUC)
97-05-12	Connecticut Light & Power (Connecticut PUC)
R-00973953	Application of PECO Energy Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code (Pennsylvania PUC)
97-65	Application of Delmarva Power &Light Co. for Application of a Cost Accounting Manual and a Code of Conduct (Delaware PSC)
16705	Entergy Gulf States, Inc. (Cities Steering Committee)
E-1072-97-067	Southwestern Telephone Co. (Arizona Corporation Commission)
Non-Docketed Staff Investigation	Delaware - Estimate Impact of Universal Services Issues (Delaware PSC)
PU-314-97-12	US West Communications, Inc. Cost Studies (North Dakota PSC)
97-0351	Consumer Illinois Water Company (Illinois CC)
97-8001	Investigation of Issues to be Considered as a Result of Restructuring of Electric Industry (Nevada PSC)
U-0000-94-165	Generic Docket to Consider Competition in the Provision of Retail Electric Service (Arizona Corporation Commission)
98-05-006-Phase I	San Diego Gas & Electric Co., Section 386 costs (California PUC)
9355-U	Georgia Power Company Rate Case (Georgia PUC)
97-12-020 - Phase I	Pacific Gas & Electric Company (California PUC)
U-98-56, U-98-60, U-98-65, U-98-67	Investigation of 1998 Intrastate Access charge filings (Alaska PUC)
(U-99-66, U-99-65, U-99-56, U-99-52)	Investigation of 1999 Intrastate Access Charge filing (Alaska PUC)
Phase II of 97-SCCC-149-GIT	Southwestern Bell Telephone Company Cost Studies (Kansas CC)
PU-314-97-465	US West Universal Service Cost Model (North Dakota PSC)
Non-docketed Assistance	Bell Atlantic - Delaware, Inc., Review of New Telecomm. and Tariff Filings (Delaware PSC)
Contract Dispute	City of Zeeland, MI - Water Contract with the City of Holland, MI (Before an arbitration panel)
Non-docketed Project	City of Danville, IL - Valuation of Water System (Danville, IL)
Non-docketed Project	Village of University Park, IL - Valuation of Water and Sewer System (Village of University Park, Illinois)

E-1032-95-417	Citizens Utility Co., Maricopa Water/Wastewater Companies et al. (Arizona Corporation Commission)
T-1051B-99-0497	Proposed Merger of the Parent Corporation of Qwest Communications Corporation, LCI International Telecom Corp., and US West Communications, Inc. (Arizona CC)
T-01051B-99-0105	US West Communications, Inc. Rate Case (Arizona CC)
A00-07-043	Pacific Gas & Electric - 2001 Attrition (California PUC)
T-01051B-99-0499	US West/Quest Broadband Asset Transfer (Arizona CC)
99-419/420	US West, Inc. Toll and Access Rebalancing (North Dakota PSC)
PU314-99-119	US West, Inc. Residential Rate Increase and Cost Study Review (North Dakota PSC
98-0252	Ameritech - Illinois, Review of Alternative Regulation Plan (Illinois CUB)
00-108	Delmarva Billing System Investigation (Delaware PSC)
U-00-28	Matanuska Telephone Association (Alaska PUC)
Non-Docketed	Management Audit and Market Power Mitigation Analysis of the Merged Gas System Operation of Pacific Enterprises and Enova Corporation (California PUC)
00-11-038	Southern California Edison (California PUC)
00-11-056	Pacific Gas & Electric (California PUC)
00-10-028	The Utility Reform Network for Modification of Resolution E-3527 (California PUC)
98-479	Delmarva Power & Light Application for Approval of its Electric and Fuel Adjustments Costs (Delaware PSC)
99-457	Delaware Electric Cooperative Restructuring Filing (Delaware PSC)
99-582	Delmarva Power & Light dba Conectiv Power Delivery Analysis of Code of Conduct and Cost Accounting Manual (Delaware PSC)
99-03-04	United Illuminating Company Recovery of Stranded Costs (Connecticut OCC)
99-03-36	Connecticut Light & Power (Connecticut OCC)
Civil Action No. 98-1117	West Penn Power Company vs. PA PUC (Pennsylvania PSC)
Case No. 12604	Upper Peninsula Power Company (Michigan AG)
Case No. 12613	Wisconsin Public Service Commission (Michigan AG)
41651	Northern Indiana Public Service Co Overearnings investigation (Indiana UCC)
13605-U	Savannah Electric & Power Company – FCR (Georgia PSC)
14000-U	Georgia Power Company Rate Case/M&S Review (Georgia PSC)
13196-U	Savannah Electric & Power Company Natural Gas Procurement and Risk Management/Hedging Proposal, Docket No. 13196-U (Georgia PSC)
Non-Docketed	Georgia Power Company & Savannah Electric & Power FPR Company Fuel Procurement Audit (Georgia PSC)
Non-Docketed	Transition Costs of Nevada Vertically Integrated Utilities (US Department of Navy)
Application No. 99-01-016, Phase I	Post-Transition Ratemaking Mechanisms for the Electric Industry Restructuring (US Department of Navy)
99-02-05	Connecticut Light & Power (Connecticut OCC)
01-05-19-RE03	Yankee Gas Service Application for a Rate Increase, Phase I-2002-IERM (Connecticut OCC)
G-01551A-00-0309	Southwest Gas Corporation, Application to amend its rate Schedules (Arizona CC)
00-07-043	Pacific Gas & Electric Company Attrition & Application for a rate increase (California PUC)

97-12-020 Phase II	Pacific Gas & Electric Company Rate Case (California PUC)
01-10-10	United Illuminating Company (Connecticut OCC)
13711-U	Georgia Power FCR (Georgia PSC)
02-001	Verizon Delaware § 271(Delaware DPA)
02-BLVT-377-AUD	Blue Valley Telephone Company Audit/General Rate Investigation (Kansas CC)
02-S&TT-390-AUD	S&T Telephone Cooperative Audit/General Rate Investigation (Kansas CC)
01-SFLT-879-AUD	Sunflower Telephone Company Inc., Audit/General Rate Investigation (Kansas CC)
01-BSTT-878-AUD	Bluestem Telephone Company, Inc. Audit/General Rate Investigation (Kansas CC)
P404, 407, 520, 413 426, 427, 430, 421/ CI-00-712	Sherburne County Rural Telephone Company, dba as Connections, Etc. (Minnesota DOC)
U-01-85	ACS of Alaska, dba as Alaska Communications Systems (ACS), Rate Case (Alaska Regulatory Commission PAS)
U-01-34	ACS of Anchorage, dba as Alaska Communications Systems (ACS), Rate Case (Alaska Regulatory Commission PAS)
U-01-83	ACS of Fairbanks, dba as Alaska Communications Systems (ACS), Rate Case (Alaska Regulatory Commission PAS)
U-01-87	ACS of the Northland, dba as Alaska Communications Systems (ACS), Rate Case (Alaska Regulatory Commission PAS)
96-324, Phase II	Verizon Delaware, Inc. UNE Rate Filing (Delaware PSC)
03-WHST-503-AUD	Wheat State Telephone Company (Kansas CC)
04-GNBT-130-AUD	Golden Belt Telephone Association (Kansas CC)
Docket 6914	Shoreham Telephone Company, Inc. (Vermont BPU)
Docket No. E-01345A-06-009	Arizona Public Service Company (Arizona Corporation Commission)
Case No. 05-1278-E-PC-PW-42T	Appalachian Power Company and Wheeling Power Company both d/b/a American Electric Power (West Virginia PSC)
Docket No. 04-0113	Hawaiian Electric Company (Hawaii PUC)
Case No. U-14347	Consumers Energy Company (Michigan PSC)
Case No. 05-725-EL-UNC	Cincinnati Gas & Electric Company (PUC of Ohio)
Docket No. 21229-U	Savannah Electric & Power Company (Georgia PSC)
Docket No. 19142-U	Georgia Power Company (Georgia PSC)
Docket No. 03-07-01RE01	Connecticut Light & Power Company (CT DPUC)
Docket No. 19042-U	Savannah Electric & Power Company (Georgia PSC)
Docket No. 2004-178-E	South Carolina Electric & Gas Company (South Carolina PSC)
Docket No. 03-07-02	Connecticut Light & Power Company (CT DPUC)
Docket No. EX02060363, Phases I&II	Rockland Electric Company (NJ BPU)
Docket No. U-00-88	ENSTAR Natural Gas Company and Alaska Pipeline Company (Regulatory Commission of Alaska)
Phase 1-2002 IERM, Docket No. U-02-075	Interior Telephone Company, Inc. (Regulatory Commission of Alaska)
Docket No. 05-SCNT-1048-AUD	South Central Telephone Company (Kansas CC)
Docket No. 05-TRCT-607-KSF	Tri-County Telephone Company (Kansas CC)
Docket No. 05-KOKT-060-AUD	Kan Okla Telephone Company (Kansas CC)
Docket No. 2002-747	Northland Telephone Company of Maine (Maine PUC)

Docket No. 2003-34	Sidney Telephone Company (Maine PUC)
Docket No. 2003-35	Maine Telephone Company (Maine PUC)
Docket No. 2003-36	China Telephone Company (Maine PUC)
Docket No. 2003-37	Standish Telephone Company (Maine PUC)
Docket Nos. U-04-022, U-04-023	Anchorage Water and Wastewater Utility (Regulatory Commission of Alaska)
Case 05-116-U/06-055-U	Entergy Arkansas, Inc. EFC (Arkansas Public Service Commission)
Case 04-137-U	Southwest Power Pool RTO (Arkansas Public Service Commission)
Case No. 7109/7160	Vermont Gas Systems (Department of Public Service)
Case No. ER-2006-0315	Empire District Electric Company (Missouri PSC)
Case No. ER-2006-0314	Kansas City Power & Light Company (Missouri PSC)
Docket No. U-05-043,44	Golden Heart Utilities/College Park Utilities (Regulatory Commission of Alaska)
A-122250F5000	Equitable Resources, Inc. and The Peoples Natural Gas Company, d/b/a Dominion Peoples (Pennsylvania PUC)
E-01345A-05-0816	Arizona Public Service Company (Arizona CC)
Docket No. 05-304	Delmarva Power & Light Company (Delaware PSC)
05-806-EL-UNC	Cincinnati Gas & Electric Company (Ohio PUC)
U-06-45	Anchorage Water Utility (Regulatory Commission of Alaska)
03-93-EL-ATA, 06-1068-EL-UNC	Duke Energy Ohio (Ohio PUC)
PUE-2006-00065	Appalachian Power Company (Virginia Corporation Commission)
G-04204A-06-0463 et. al	UNS Gas, Inc. (Arizona CC)
U-06-134	Chugach Electric Association, Inc. (Regulatory Commission of Alaska)
Docket No. 2006-0386	Hawaiian Electric Company, Inc (Hawaii PUC)
E-01933A-07-0402	Tucson Electric Power Company (Arizona CC)
G-01551A-07-0504	Southwest Gas Corporation (Arizona CC)
Docket No.UE-072300	Puget Sound Energy, Inc. (Washington UTC)
PUE-2008-00009	Virginia-American Water Company (Virginia SCC)
PUE-2008-00046	Appalachian Power Company (Virginia SCC)
E-01345A-08-0172	Arizona Public Service Company (Arizona CC)
A-2008-2063737	Babcock & Brown Infrastructure Fund North America, LP. and The Peoples Natural Gas Company, d/b/a Dominion Peoples (Pennsylvania PUC)
08-1783-G-42T	Hope Gas, Inc., dba Dominion Hope (West Virginia PSC)
08-1761-G-PC	Hope Gas, Inc., dba Dominion Hope, Dominion Resources, Inc., and Peoples Hope Gas Companies (West Virginia PSC)
Docket No. 2008-0083	Hawaiian Electric Company, Inc. (Hawaii PUC)
Docket No. 2008-0266	Young Brothers, Limited (Hawaii PUC)
G-04024A-08-0571	UNS Gas, Inc. (Arizona CC)
Docket No. 09-29	Tidewater Utilities, Inc. (Delaware PSC)
Docket No. UE-090704	Puget Sound Energy, Inc. (Washington UTC)
09-0878-G-42T	Mountaineer Gas Company (West Virginia PSC)
2009-UA-0014	Mississippi Power Company (Mississippi PSC)
Docket No. 09-0319	Illinois-American Water Company (Illinois CC)
Docket No. 09-414	Delmarva Power & Light Company (Delaware PSC)
R-2009-2132019	Aqua Pennsylvania, Inc. (Pennsylvania PUC)
Docket Nos. U-09-069, U-09-070	ENSTAR Natural Gas Company (Regulatory Commission of Alaska)
Docket Nos. U-04-023, U-04-024	Anchorage Water and Wastewater Utility - Remand (Regulatory Commission of Alaska)
W-01303A-09-0343 & SW-01303A-09-0343	Arizona-American Water Company (Arizona CC)
09-872-EL-FAC & 09-873-EL-FAC	Financial Audits of the FAC of the Columbus Southern Power Company and the Ohio Power Company - Audit I (Ohio PUC)

2010-00036	Kentucky-American Water Company (Kentucky PSC)
E-04100A-09-0496	Southwest Transmission Cooperative, IHnc. (Arizona CC)
E-01773A-09-0472	Arizona Electric Power Cooperative, Inc. (Arizona CC)
R-2010-2166208, R-2010-2166210, R-2010-2166212, & R-2010-2166214	Pennsylvania-American Water Company (Pennsylvania PUC)
PSC Docket No. 09-0602	Central Illinois Light Company D/B/A AmerenCILCO; Central Illinois Public Service Company D/B/A AmerenCIPS; Illinois Power Company D/B/A AmerenIP (Illinois CC)
10-0713-E-PC	Allegheny Power and FirstEnergy Corp. (West Virginia PSC)
Docket No. 31958	Georgia Power Company (Georgia PSC)
Docket No. 10-0467	Commonwealth Edison Company (Illinois CC)
PSC Docket No. 10-237	Delmarva Power & Light Company (Delaware PSC)
U-10-51	Cook Inlet Natural Gas Storage Alaska, LLC (Regulatory Commission of Alaska)
10-0699-E-42T	Appalachian Power Company and Wheeling Power Company (West Virginia PSC)
10-0920-W-42T	West Virginia-American Water Company (West Virginia PSC)
A.10-07-007	California-American Water Company (California PUC)
A-2010-2210326	TWP Acquisition (Pennsylvania PUC)
09-1012-EL-FAC	Financial, Management, and Performance Audit of the FAC for Dayton Power and Light – Audit 1 (Ohio PUC)
10-268-EL FAC et al.	Financial Audit of the FAC of the Columbus Southern Power Company and the Ohio Power Company – Audit II (Ohio PUC)
Docket No. 2010-0080	Hawaiian Electric Company, Inc. (Hawaii PUC)
G-01551A-10-0458	Southwest Gas Corporation (Arizona CC)
10-KCPE-415-RTS	Kansas City Power & Light Company – Remand (Kansas CC)
PUE-2011-00037	Virginia Appalachian Power Company (Commonwealth of Virginia SCC)
R-2011-2232243	Pennsylvania-American Water (Pennsylvania PUC)
U-11-100	Power Purchase Agreement between Chugach Association, Inc. and Fire Island Wind, LLC (Regulatory Commission of Alaska)
A.10-12-005	San Diego Gas & Electric Company (California PUC)
PSC Docket No. 11-207	Artesian Water Company, Inc. (Delaware PSC)
Cause No. 44022	Indiana-American Water Company, Inc. (Indiana Utility Regulatory Commission)
PSC Docket No. 10-247	Management Audit of Tidewater Utilities, Inc. Affiliate Transactions (Delaware Public Service Commission)
G-04204A-11-0158	UNS Gas, Inc. (Arizona Corporation Commission)
E-01345A-11-0224	Arizona Public Service Company (Arizona CC)
UE-111048 & UE-111049	Puget Sound Energy, Inc. (Washington Utilities and Transportation Commission)
Docket No. 11-0721	Commonwealth Edison Company (Illinois CC)
11AL-947E	Public Service Company of Colorado (Colorado PSC)
U-11-77 & U-11-78	Golden Heart Utilities, Inc. and College Utilities Corporation (The Regulatory Commission of Alaska)
Docket No. 11-0767	Illinois-American Water Company (Illinois CC)
PSC Docket No. 11-397	Tidewater Utilities, Inc. (Delaware PSC)
Cause No. 44075	Indiana Michigan Power Company (Indiana Utility Regulatory Commission)
Docket No. 12-0001	Ameren Illinois Company (Illinois CC)
11-5730-EL-FAC	Financial, Management, and Performance Audit of the FAC for Dayton Power and Light – Audit 2 (Ohio PUC)
PSC Docket No. 11-528	Delmarva Power & Light Company (Delaware PSC)
11-281-EL-FAC et al.	Financial Audit of the FAC of the Columbus Southern Power Company and the Ohio Power Company – Audit III (Ohio PUC)

Cause No. 43114-IGCC-4S1	Duke Energy Indiana, Inc. (Indiana Utility Regulatory Commission)
Docket No. 12-0293	Ameren Illinois Company (Illinois CC)
Docket No. 12-0321	Commonwealth Edison Company (Illinois CC)
12-02019 & 12-04005	Southwest Gas Corporation (Public Utilities Commission of Nevada)
Docket No. 2012-218-E	South Carolina Electric & Gas (South Carolina PSC)
Docket No. E-72, Sub 479	Dominion North Carolina Power (North Carolina Utilities Commission)
12-0511 & 12-0512	North Shore Gas Company and The Peoples Gas Light and Coke Company (Illinois CC)
E-01933A-12-0291	Tucson Electric Power Company (Arizona CC)
Case No. 9311	Potomac Electric Power Company (Maryland PSC)
Cause No. 43114-IGCC-10	Duke Energy Indiana, Inc. (Indiana Utility Regulatory Commission)
Docket No. 36498	Georgia Power Company (Georgia PSC)
Case No. 9316	Columbia Gas of Maryland, Inc. (Maryland PSC)
Docket No. 13-0192	Ameren Illinois Company (Illinois CC)
12-1649-W-42T	West Virginia-American Water Company (West Virginia PSC)
E-04204A-12-0504	UNS Electric, Inc. (Arizona CC)
PUE-2013-00020	Virginia Electric and Power Company (Virginia SCC)
R-2013-2355276	Pennsylvania-American Water Company (Pennsylvania PUC)
Formal Case No. 1103	Potomac Electric Power Company (District of Columbia PSC)
U-13-007	Chugach Electric Association, Inc. (The Regulatory Commission of Alaska)
12-2881-EL-FAC	Financial, Management, and Performance Audit of the FAC for Dayton Power and Light – Audit 3 (Ohio PUC)
Docket No. 36989	Georgia Power Company (Georgia PSC)
Cause No. 43114-IGCC-11	Duke Energy Indiana, Inc. (Indiana Utility Regulatory Commission)
UM 1633	Investigation into Treatment of Pension Costs in Utility Rates (Oregon PUC)
13-1892-EL FAC	Financial Audit of the FAC and AER of the Ohio Power Company – Audit I (Ohio PUC)
E-04230A-14-0011 & E-01933A-14-0011	Reorganization of UNS Energy Corporation with Fortis, Inc. (Arizona CC)
14-255-EL RDR	Regulatory Compliance Audit of the 2013 DIR of Ohio Power Company (Ohio PUC)
U-14-001	Chugach Electric Association, Inc. (The Regulatory Commission of Alaska)
U-14-002	Alaska Power Company (The Regulatory Commission of Alaska)
PUE-2014-00026	Virginia Appalachian Power Company (Commonwealth of Virginia SCC)
14-0117-EL-FAC	Financial, Management, and Performance Audit of the FAC and Purchased Power Rider for Dayton Power and Light – Audit 1 (Ohio PUC)
14-0702-E-42T	Monongahela Power Company and The Potomac Edison Company (West Virginia PSC)
Formal Case No. 1119	Merger of Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC, and New Special Purpose Entity, LLC (District of Columbia PSC)
R-2014-2428742	West Penn Power Company (Pennsylvania PUC)
R-2014-2428743	Pennsylvania Electric Company (Pennsylvania PUC)
R-2014-2428744	Pennsylvania Power Company (Pennsylvania PUC)
R-2014-2428745	Metropolitan Edison Company (Pennsylvania PUC)
Cause No. 43114-IGCC-12/13	Duke Energy Indiana, Inc. (Indiana Utility Regulatory Commission)
14-1152-E-42T	Appalachian Power Company and Wheeling Power Company (West Virginia PSC)
WS-01303A-14-0010	EPCOR Water Arizona, Inc. (Arizona CC)
2014-000396	Kentucky Power Company (Kentucky PSC)
15-03-45	Iberdrola, S.A. Et Al, and UIL Holdings Corporation merger (Connecticut PURA)
A.14-11-003	San Diego Gas & Electric Company (California PUC)
U-14-111	ENSTAR Natural Gas Company (Regulatory Commission of Alaska)

2015-UN-049	Atmos Energy Corporation (Mississippi PSC)
15-0003-G-42T	Mountaineer Gas Company (West Virginia PSC)
PUE-2015-00027	Virginia Electric and Power Company (Commonwealth of Virginia SCC)
Docket No. 2015-0022	Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc., Maui Electric Company Limited, and NextEra Energy, Inc. (Hawaii PUC)