

TENNESSEE REGULATORY AUTHORITY

502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

August 24, 2015

Rachel A. Newton, Esq.
Assistant Attorney General
Office of the Attorney General
P.O. Box 20207
Nashville, TN 37202-0207
rachel.newton@ag.tn.gov

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

Dear Ms. Newton:

To assist the Authority in its evaluation of the above-captioned matter, please provide responses to the attached TRA First Data Request to the Consumer Advocate and Protection Division.

It is requested that all responses be provided no later than 2:00 p.m., September 3, 2015. In accordance with TRA rules submit either (1) an original and thirteen written copies of your response or (2) an original and four written copies and an electronic version. Should you have any questions or need clarification regarding any requested item, please contact me at (615) 770-6884. Thank you for your prompt attention to this matter.

Sincerely,

 with permission

David Foster, Chief
Utilities Division

cc: Docket File

Henry Walker, Esq.
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Attachment

TRA FIRST DATA REQUEST TO CONSUMER ADVOCATE

DATA REQUESTS

1. On page 22 of Ralph C. Smith's Direct Testimony, an allocation percentage of 20% is recommended for the Operator Fee to B&W's pipeline operations. Please provide support for this allocation factor and a detailed calculation of how this allocation factor was derived.
2. Could a rate base amount be computed beginning with the net book value of Gasco Distribution Systems, Inc., reported in its 2009 Annual Report filed with the Authority, and thereafter including any subsequent additions and retirements to plant made by B&W? If so, please provide such calculation. If not, please explain why such calculation cannot be determined.
3. Please fully describe all benefits to ratepayers that would result from including an acquisition premium in rates.
4. Please quantify any tangible, measureable benefits to ratepayers (e.g., cost savings, efficiencies, etc.) that would result from including an acquisition premium in rates.