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PGS's Response to Staff's Second  
Interrogatories Nos. 7-8

**PEOPLES GAS SYSTEM  
DOCKET NO. 20210004-GU  
STAFF'S SECOND SET OF  
INTERROGATORIES  
INTERROGATORY NO. 7  
BATES PAGES: 1 - 2  
FILED: SEPTEMBER 14, 2021**

7. For the NGVS Rate Schedule, the 2022 Projection schedule indicates that zero bills are forecasted for the January through December, 2022 period. Referring to the same information in the 2021 Projection schedule, 48 bills were forecasted for the January through December, 2021 period.
  - a. Comparing the entries in the 2022 and 2021 Projection schedules, please describe how the forecasted number of bills for 2022 (zero) was determined and explain the variance in forecasted bills in that year compared to 2021 (48) for NGVS Rate Schedule.
  - b. As of the date the 2022 Projection schedule was prepared, how many actual/estimated bills had been issued for customers receiving service under the NGVS Rate Schedule in the period January through December, 2021.
  - c. For the period January through December 2021, what amount of (actual/estimated) revenue was collected from customers in the NGVS Rate Class?
  - d. For the period January through December 2021, what conservation program(s) did the customers receiving service under the NGVS Rate Class participate in? Discuss in your response how the projection for 2021 has compared to actual/estimated conservation program enrollments in the January-December 2021 period.
  - e. Please discuss and show the calculations to demonstrate how the conservation cost recovery factor of \$0.01957 dollars per therm was set when the 2021 Projection schedule was developed.
  - f. In the 2022 Projection schedule, please explain why a conservation cost recovery factor of \$0 dollars per therm is proposed for the NGVS Rate Schedule for the January through December 2022 period.
  - g. Would all rate classes with proposed conservation cost recovery factors greater than \$0 dollars per therm for the January through December, 2022 period cross subsidize the NGVS Rate Schedule if customer(s) were to begin service under this rate schedule during this period. Please explain your response.

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- A.**
- a. By its Order No. PSC-2020-0485-FOF-GU, issued December 10, 2020, in Docket No. 20200051-GU, the Commission approved a Rate Case Settlement Agreement between Peoples, OPC, and FIPUG. The Settlement Agreement identified the deletion of rate schedule Natural Gas Vehicle Service -1 (NGVS-1) from its tariff, as this rate schedule had been closed to new customers since 2013, and the remaining customers were shifted to their otherwise applicable rate schedule.
  - b. Since this rate schedule was deleted, no bills have been issued for it in 2021.
  - c. No revenues have been collected from this rate class in 2021.
  - d. There have not been any customers taking service in this rate class in 2021.
  - e. The 2021 Conservation Cost Recovery factor of \$0.01957 was calculated before the approval of Peoples' 2020 Rate Case Settlement Agreement. At that time, Peoples projected 48 bills and 46,668 therms sold under NGVS-1. The calculation of the factor is detailed on Schedule C-1 of Peoples' 2021 Projection Filing, filed on August 7, 2020.
  - f. \$0 per therm was proposed because this rate schedule has been deleted, therefore no therms will be sold under it.
  - g. See Peoples' Response to No. 7a.

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INTERROGATORY NO. 8  
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8. The 2022 Projection schedule indicates that 336 bills are forecasted for the CSLS Rate Schedule. Referring to the same information in the 2021 Projection schedule, zero bills were forecasted.
  - a. Comparing the entries in the 2022 and 2021 Projection schedules, please explain the variance of 336 forecasted bills for CSLS Rate Schedule, for the January through December, 2022 period.
  - b. Please identify which conservation program(s) the Company expects to provide to the customers receiving service under the CSLS Rate Schedule in 2022.
- A.
  - a. The entry of the number of bills for each rate class is used to calculate revenues by multiplying bills times the appropriate customer charge. Customers taking service under the CSLS Rate Schedule do not pay a customer charge, which, when multiplied by the number of bills, would result in no revenue. A value of "0" was entered for 2021 since it does not factor into the revenue calculations. The Company elected to enter the actual number of projected bills for 2022 to provide the Commission with more information. However, this did not change the revenue calculations.
  - b. CSLS is Peoples' Commercial Street Lighting Service Rate Schedule. Customers taking service under this rate class could request to participate in Peoples' Commercial Retrofit Electric Replacement Program, which encourages customers to install energy efficient technologies that are not covered by Peoples' other demand-side management programs.