

**Kenneth W. Christman**  
*Assistant General Counsel*



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July 7, 2020

VIA ELECTRONIC FILING

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

Re: D.P.U. 20-AMP and D.P.U 19-07

Dear Secretary Marini:

Enclosed for filing are the responses of Bay State Gas Company d/b/a Columbia Gas of Massachusetts ("Company") to the Information Requests issued by the Department of Public Utilities in the above referenced dockets.

Please do not hesitate to contact me at 724-416-6315 with any question you may have.

Very truly yours,

A handwritten signature in black ink that reads "Kenneth W. Christman". The signature is written in a cursive, flowing style.

Kenneth W. Christman

cc: Katie Zilgme, Esq., Hearing Officer  
Service List for D.P.U. 20-AMP and D.P.U. 19-07

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

Bay State Gas Company d/b/a Columbia Gas of Massachusetts	) ) ) )	D.P.U. 20-AMP D.P.U. 19-07
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**AFFIDAVIT OF CHUN-YI LAI**

**Chun-Yi Lai** does hereby depose and say as follows:

I, Chun-Yi Lai, on behalf Columbia Gas of Massachusetts, certify that the attached responses to information requests which bear my name, were prepared by me or under my supervision and are true and accurate to the best of my knowledge and belief.

Signed under the pains and penalties of perjury as of this 7<sup>th</sup> day of July, 2020.

  
\_\_\_\_\_  
Chun-Yi Lai

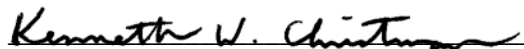
**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

_____	)	
Bay State Gas Company d/b/a	)	D.P.U. 20-AMP
Columbia Gas of Massachusetts	)	D.P.U. 19-07
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. § 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Westborough, MA this 8<sup>th</sup> day of July, 2020.



Kenneth W. Christman, Esq.  
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RESPONSE OF COLUMBIA GAS OF MASSACHUSETTS TO THE  
FIRST SET OF INFORMATION REQUESTS FROM THE  
DEPARTMENT OF PUBLIC UTILITIES

Responsible: Chun-Yi Lai, Manager Regulatory

DPU-1-4-CMA: Local Gas Distribution Companies refer to Attachment B, Table 1.

Please indicate the number of default service customers and customers served by a competitive supplier by rate class for January 2018 through March 2020.

Response: Please see Attachment B DPU-1-4-CMA.

**Table 1**      **Number of Customers by Supplier Type**

Month	R-1 Customers			R-2 Customers			R-3 Customers			R-4 Customers		
	# of Default Service Customers	# of Competitive Supply Customers	Total # of Customers	# of Default Service Customers	# of Competitive Supply Customers	Total # of Customers	# of Default Service Customers	# of Competitive Supply Customers	Total # of Customers	# of Default Service Customers	# of Competitive Supply Customers	Total # of Customers
Mar-20	16,008	15	16,023	2,846	0	2,846	241,258	278	241,536	37,495	0	37,495
Feb-20	15,946	15	15,961	2,927	0	2,927	240,473	278	240,751	37,855	0	37,855
Jan-20	15,998	15	16,013	2,971	0	2,971	240,254	275	240,529	37,647	0	37,647
Dec-19	16,256	15	16,271	2,823	0	2,823	241,332	274	241,606	35,960	0	35,960
Nov-19	16,257	16	16,273	2,880	0	2,880	240,151	269	240,420	36,413	0	36,413
Oct-19	16,229	16	16,245	2,897	0	2,897	238,682	259	238,941	36,310	0	36,310
Sep-19	16,305	16	16,321	2,766	0	2,766	238,196	259	238,455	35,110	0	35,110
Aug-19	16,228	16	16,244	2,880	0	2,880	236,912	241	237,153	36,261	0	36,261
Jul-19	16,199	16	16,215	2,910	0	2,910	236,480	241	236,721	36,616	0	36,616
Jun-19	16,361	16	16,377	2,781	0	2,781	237,798	241	238,039	35,938	0	35,938
May-19	16,247	40	16,287	2,880	1	2,881	237,416	504	237,920	36,350	43	36,393
Apr-19	16,210	57	16,267	2,894	1	2,895	238,094	629	238,723	35,620	66	35,686
Mar-19	16,178	57	16,235	2,989	1	2,990	236,619	626	237,245	37,525	75	37,600
Feb-19	16,168	59	16,227	3,099	1	3,100	236,091	631	236,722	37,908	80	37,988
Jan-19	16,330	62	16,392	3,126	1	3,127	235,936	640	236,576	37,646	81	37,727
Dec-18	16,612	62	16,674	2,915	0	2,915	236,854	779	237,633	35,965	76	36,041
Nov-18	16,600	62	16,662	2,994	0	2,994	235,690	785	236,475	36,406	79	36,485
Oct-18	16,578	62	16,640	3,032	0	3,032	234,623	788	235,411	36,331	78	36,409
Sep-18	16,665	64	16,729	2,912	0	2,912	233,957	824	234,781	34,890	81	34,971
Aug-18	16,557	65	16,622	3,012	1	3,013	232,465	836	233,301	35,676	82	35,758
Jul-18	16,531	66	16,597	3,051	1	3,052	231,907	846	232,753	36,316	85	36,401
Jun-18	16,704	67	16,771	2,908	4	2,912	233,302	854	234,156	35,432	77	35,509
May-18	16,624	62	16,686	3,045	4	3,049	233,183	845	234,028	36,384	78	36,462
Apr-18	16,617	62	16,679	3,071	4	3,075	234,276	861	235,137	35,814	78	35,892
Mar-18	16,631	61	16,692	3,097	5	3,102	233,494	843	234,337	37,053	115	37,168
Feb-18	16,614	58	16,672	3,181	9	3,190	233,281	814	234,095	37,086	222	37,308
Jan-18	16,795	53	16,848	3,228	6	3,234	233,365	743	234,108	36,759	158	36,917

RESPONSE OF COLUMBIA GAS OF MASSACHUSETTS TO THE  
FIRST SET OF INFORMATION REQUESTS FROM THE  
DEPARTMENT OF PUBLIC UTILITIES

Responsible: Chun-Yi Lai, Manager Regulatory

DPU-1-5-CMA: Local Gas Distribution Companies refer to Attachment B, Table 2.

Please provide the information specified in columns B through H, and columns M through N (see instructions provided at the bottom of the worksheet).

Response: Please see Attachment B DPU-1-5-CMA. The amounts presented in Columns D and E reflect the energy supply costs, or gas costs, billed to low income residential transportation customers on the behalf of competitive suppliers. The Company currently does not have low income residential transportation customers.

Table 2 Calculation of the "Incremental" Low-Income Subsidy and Arrearage Management Program Costs Recovered through the RAAF

Month	Total Sales to R-2 Customers Served by Competitive Suppliers (therms)	Total Sales to R-4 Customers Served by Competitive Suppliers (therms)	Total Supply Costs Billed to R-2 Customers Served by Competitive Suppliers (\$)	Total Supply Costs Billed to R-4 Customers Served by Competitive Suppliers (\$)	R-2 GAF (\$/therm)	R-4 GAF (\$/therm)	Low-Income Discount Rate (%)	Supply Costs that Would Have Been Billed to Low-Income Customers if All Were on Default Service Rate (\$)	"Incremental" Supply Costs (\$)	"Incremental" Supply Costs Recovered through RAAF (\$)	"Incremental" Supply Costs Recovered from Low Income Ratepayers (\$)	Total Supply Related AMP Costs Recovered through RAAF from AMP Participants Served by Competitive Suppliers (\$)	Supply-Related AMP Costs that Would Have Been Recovered through RAAF if All AMP Participants Served by Competitive Suppliers were on Default Service Rate (\$)	"Incremental" AMP Costs Recovered through RAAF (\$)
Mar-20	0	0	\$0	\$0	\$0.46100	\$0.56450	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Feb-20	0	0	\$0	\$0	\$0.46100	\$0.56450	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Jan-20	0	0	\$0	\$0	\$0.46100	\$0.56450	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Dec-19	0	0	\$0	\$0	\$0.46100	\$0.56450	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Nov-19	0	0	\$0	\$0	\$0.46100	\$0.56450	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Oct-19	0	0	\$0	\$0	\$0.29410	\$0.32600	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Sep-19	0	0	\$0	\$0	\$0.29410	\$0.32600	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Aug-19	0	0	\$0	\$0	\$0.29410	\$0.32600	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Jul-19	0	0	\$0	\$0	\$0.29410	\$0.32600	25%	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Jun-19	12	1,390	\$12	\$1,076	\$0.37360	\$0.40550	25%	\$568	\$519	\$130	\$389	\$53	\$30	\$23
May-19	16	4,428	\$14	\$3,394	\$0.37360	\$0.40550	25%	\$1,802	\$1,607	\$402	\$1,205	\$0	\$0	\$0
Apr-19	16	6,313	\$13	\$4,812	\$0.56590	\$0.64470	25%	\$4,079	\$746	\$187	\$560	\$0	\$0	\$0
Mar-19	24	13,000	\$20	\$9,878	\$0.56590	\$0.64470	25%	\$8,395	\$1,503	\$376	\$1,127	\$157	\$135	\$22
Feb-19	16	15,957	\$13	\$12,104	\$0.56590	\$0.64470	25%	\$10,297	\$1,821	\$455	\$1,366	\$275	\$225	\$50
Jan-19	5	14,354	\$4	\$10,301	\$0.74600	\$0.82480	25%	\$11,843	-\$1,538	-\$385	-\$1,154	\$240	\$253	-\$13
Dec-18	3	13,894	\$2	\$10,164	\$0.74600	\$0.82480	25%	\$11,462	-\$1,296	-\$324	-\$972	\$209	\$166	\$43
Nov-18	6	9,349	\$4	\$7,059	\$0.56940	\$0.64820	25%	\$6,063	\$1,000	\$250	\$750	\$134	\$85	\$49
Oct-18	0	2,620	\$0	\$1,927	\$0.24100	\$0.33200	25%	\$870	\$1,057	\$264	\$793	\$77	\$25	\$52
Sep-18	5	1,724	\$4	\$1,224	\$0.24100	\$0.33200	25%	\$574	\$655	\$164	\$491	\$32	\$10	\$22
Aug-18	5	1,570	\$4	\$1,185	\$0.24100	\$0.33200	25%	\$522	\$667	\$167	\$500	\$14	\$5	\$9
Jul-18	25	1,796	\$21	\$1,336	\$0.24100	\$0.33200	25%	\$602	\$755	\$189	\$566	\$23	\$8	\$15
Jun-18	28	2,361	\$24	\$1,765	\$0.27820	\$0.36920	25%	\$879	\$910	\$227	\$682	\$60	\$21	\$39
May-18	48	4,828	\$41	\$3,596	\$0.27820	\$0.36920	25%	\$1,796	\$1,840	\$460	\$1,380	\$70	\$27	\$43
Apr-18	96	14,418	\$75	\$10,724	\$0.89050	\$0.96760	25%	\$14,036	-\$3,238	-\$809	-\$2,428	\$93	\$81	\$12
Mar-18	252	30,914	\$202	\$24,386	\$0.89050	\$0.96760	25%	\$30,137	-\$5,549	-\$1,387	-\$4,162	\$234	\$202	\$32
Feb-18	260	26,232	\$210	\$21,558	\$0.89050	\$0.96760	25%	\$25,614	-\$3,846	-\$962	-\$2,885	\$293	\$253	\$40
Jan-18	204	30,448	\$170	\$25,287	\$0.46300	\$0.54010	25%	\$16,539	\$8,918	\$2,229	\$6,688	\$331	\$160	\$171
<b>Totals</b>	<b>1,021</b>	<b>195,596</b>	<b>\$833</b>	<b>\$151,777</b>				<b>\$146,078</b>	<b>\$6,532</b>	<b>\$1,633</b>	<b>\$4,899</b>	<b>\$2,297</b>	<b>\$1,686</b>	<b>\$611</b>

Instructions for Data Entry Cells

- Column B Enter the total number of MMBtu sold each month to R-2 customers served by a competitive supplier
- Column C Enter the total number of MMBtu sold each month to R-4 customers served by a competitive supplier
- Column D Enter the total dollars billed each month to R-2 customers served by a competitive supplier
- Column E Enter the total dollars billed each month to R-4 customers served by a competitive supplier
- Column F Enter the GAF for R-2 customers that was applicable in the month
- Column G Enter the GAF for R-4 customers that was applicable in the month
- Column H Enter the applicable low-income customer discount rate that was in effect during the month 25%
- Column M Enter the total dollars recovered through the AMP for energy supply related costs from AMP participants served by competitive suppliers
- Column N Enter the total dollars that would have been recovered through the AMP for energy supply related costs if all AMP participants served by competitive suppliers were on default service

RESPONSE OF COLUMBIA GAS OF MASSACHUSETTS TO THE  
FIRST SET OF INFORMATION REQUESTS FROM THE  
DEPARTMENT OF PUBLIC UTILITIES

Responsible: Chun-Yi Lai, Manager Regulatory

DPU-1-6-CMA: Local Gas Distribution Companies refer to Attachment B, Table 3.

(a) Please provide the information specified in columns B through G, and columns J through M (see instructions provided at the bottom of the worksheet).

(b) Also provide any relevant supporting documentation that was used to calculate values entered into Table 3.

Response: (a) Please see Attachment B DPU-1-6-CMA.

(b) Please see Attachment B DPU-1-6-CMA Back up Schedule for the supporting documentation used to calculate values entered in Columns F & L. The incremental costs from DPU-1-5-CMA were very minimal and would not have changed the RAAF's that were in effect.



Table 3 2019 and 2020 Rate and Bill Impacts on the RAAF Resulting from the Competitive Supply Market

Line Number	Service Territory/Area	Customer Rate Class	Actual 2019 RAAF (\$/therm)	Actual 2019 RAAF Typical Monthly Customer Bill Impact (\$)	Illustrative 2019 RAAF (\$/therm)	Illustrative 2019 RAAF Typical Monthly Customer Bill Impact (\$)	Incremental Rate Impact of Competitive Supply Market on RAAF (\$/therm)	Incremental Typical Monthly Bill Impact of Competitive Supply Market on RAAF (\$)	Actual 2020 RAAF (\$/therm)	Actual 2020 RAAF Typical Monthly Customer Bill Impact (\$)	Illustrative 2020 RAAF (\$/therm)	Illustrative 2020 RAAF Typical Monthly Customer Bill Impact (\$)	Incremental Rate Impact of Competitive Supply Market on RAAF (\$/therm)	Incremental Typical Monthly Bill Impact of Competitive Supply Market on RAAF (\$)
1	All	R-1	\$0.04140	\$0.66	\$0.04140	\$0.66	\$0.00000	\$0.00	\$0.04060	\$0.64	\$0.04060	\$0.64	\$0.00000	\$0.00
2	All	R-2	\$0.04140	\$0.80	\$0.04140	\$0.80	\$0.00000	\$0.00	\$0.04060	\$0.79	\$0.04060	\$0.79	\$0.00000	\$0.00
3	All	R-3	\$0.04140	\$3.33	\$0.04140	\$3.33	\$0.00000	\$0.00	\$0.04060	\$3.26	\$0.04060	\$3.26	\$0.00000	\$0.00
4	All	R-4	\$0.04140	\$3.35	\$0.04140	\$3.35	\$0.00000	\$0.00	\$0.04060	\$3.28	\$0.04060	\$3.28	\$0.00000	\$0.00
5	All	G-40	\$0.03610	\$4.10	\$0.03610	\$4.10	\$0.00000	\$0.00	\$0.03720	\$4.23	\$0.03720	\$4.23	\$0.00000	\$0.00
6	All	G-41	\$0.02150	\$20.53	\$0.02150	\$20.53	\$0.00000	\$0.00	\$0.02120	\$20.24	\$0.02120	\$20.24	\$0.00000	\$0.00
7	All	G-42	\$0.01820	\$106.39	\$0.01820	\$106.39	\$0.00000	\$0.00	\$0.01730	\$101.13	\$0.01730	\$101.13	\$0.00000	\$0.00
8	All	G-43	\$0.01260	\$611.41	\$0.01260	\$611.41	\$0.00000	\$0.00	\$0.01180	\$572.59	\$0.01180	\$572.59	\$0.00000	\$0.00
9	All	G-50	\$0.03610	\$4.17	\$0.03610	\$4.17	\$0.00000	\$0.00	\$0.03720	\$4.30	\$0.03720	\$4.30	\$0.00000	\$0.00
10	All	G-51	\$0.02150	\$22.12	\$0.02150	\$22.12	\$0.00000	\$0.00	\$0.02120	\$21.81	\$0.02120	\$21.81	\$0.00000	\$0.00
11	All	G-52	\$0.01820	\$142.44	\$0.01820	\$142.44	\$0.00000	\$0.00	\$0.01730	\$135.40	\$0.01730	\$135.40	\$0.00000	\$0.00
12	All	G-53	\$0.01260	\$765.77	\$0.01260	\$765.77	\$0.00000	\$0.00	\$0.01180	\$717.15	\$0.01180	\$717.15	\$0.00000	\$0.00
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**Instructions for Data Entry Cells**

- Column B** If applicable, please list the Service Territory/Area in which the rate classes listed in Column C exists
- Column C** Please list each customer rate class the company has that is subject to the RAAF
- Column D** Please list the RAAFs that were in effect for each rate class for the majority of 2019
- Column E** Please list the expected monthly bill impacts for a typical customer resulting from the RAAFs that were in effect for the majority of 2019
- Column F** Using the incremental cost data as calculated in Columns K and O of Table 2, please list the RAAFs that would have been in effect for each rate class for the majority of 2019 had all low-income customers been on default service
- Column G** Using the illustrative RAAFs from Column F, please list the typical monthly customer bill impacts that would have been calculated for each rate class for the majority of 2019 had all low-income customers been on default service
- Column J** Please list the RAAFs that are in effect for each rate class for the majority of 2020
- Column K** Please list the expected monthly bill impacts for a typical customer resulting from the RAAFs that are in effect for the majority of 2020
- Column L** Using the incremental cost data as calculated in Columns K and O of Table 2, please list the RAAFs that would have been in effect for each rate class for the majority of 2020 had all low-income customers been on default service
- Column M** Using the illustrative RAAFs from Column L, please list the typical monthly customer bill impacts that would have been calculated for each rate class for the majority of 2020 had all low-income customers been on default service

**RAAF Rate Calculation  
Based on Distribution Revenues**

	TOTAL	R-1/R-2	R-3/R4	G-40	G-41	G-42	G-43	G-50	G-51	G-52	G-53
Docket DPU 15-50 Step Adjustment											
Final Distribution Target Revenue *	\$242,311,452	6,319,669	156,387,706	17,142,864	20,655,767	13,639,588	\$4,651,647	2,612,577	6,266,096	4,466,185	10,169,352
Allocation	100.0%	2.6%	64.5%	7.1%	8.5%	5.6%	1.9%	1.1%	2.6%	1.8%	4.2%
Residential Assistance Adjustment Factor - RAAF Recovery Amount Allocation	\$16,155,660										
Incremental Costs (D.P.U. 19-04, DPU 1-5, Columns K & O)	\$2,244										
Residential Assistance Adjustment Factor - RAAF Recovery Amount Allocation, plus incremental costs	\$16,157,904	\$421,411	\$10,428,304	\$1,143,127	\$1,377,376	\$909,520	\$310,183	\$174,213	\$417,838	\$297,816	\$678,117
Schedule 3 Sales Volumes--November 2019-October 2020		365,263	26,337,952	3,026,254	5,708,572	3,798,842	904,557	461,993	2,255,504	1,700,775	2,486,815
Schedule 3 Transportation Volumes--November 2019-October 2020				43,498	416,947	899,091	1,448,581	7,247	87,672	568,756	3,508,996
Schedule 3 Total Volumes--November 2019-October 2020		365,263	26,337,952	3,069,752	6,125,519	4,697,933	2,353,138	469,240	2,343,176	2,269,531	5,995,811

**RATE SECTOR RATE CALCULATION**

		Residential Sector	G-40 & G-50	G-41 & G-51	G-42 & G-52	G-43 & G-53
Final Distribution Target Revenue Allocation**	\$242,311,452	162,707,375 67.148%	19,755,441 8.153%	26,921,863 11.110%	18,105,773 7.472%	14,821,000 6.117%
Residential Assistance Adjustment Factor - RAAF Recovery Allocation (MMBtu)	\$16,157,904	\$10,849,715	\$1,317,340	\$1,795,214	\$1,207,336	\$988,300
Schedule 3 Sales Volumes--November 2019-October 2020		26,703,215	3,488,247	7,964,076	5,499,617	3,391,372
Schedule 3 Transportation Volumes--November 2019-October 2020		0	50,745	504,619	1,467,847	4,957,577
Schedule 3 Total Volumes--November 2019-October 2020	\$54,027,315	26,703,215	3,538,992	8,468,695	6,967,464	8,348,949
Billing Rate per Dth	\$0.2991	\$0.4063	\$0.3722	\$0.2120	\$0.1733	\$0.1184
Billing Rate per Therm	\$0.0299	\$0.0406	\$0.0372	\$0.0212	\$0.0173	\$0.0118

\* Schedule 11 Compliance Filing  
\*\* M.D.P.U. No. 323, 2.03

**RAAF Rate Calculation  
Based on Distribution Revenues**

	TOTAL	R-1/R-2	R-3/R4	G-40	G-41	G-42	G-43	G-50	G-51	G-52	G-53
Docket DPU 15-50 Step Adjustment											
Final Distribution Target Revenue *	\$242,311,452	6,319,669	156,387,706	17,142,864	20,655,767	13,639,588	\$4,651,647	2,612,577	6,266,096	4,466,185	10,169,352
Allocation	100.0%	2.6%	64.5%	7.1%	8.5%	5.6%	1.9%	1.1%	2.6%	1.8%	4.2%
Residential Assistance Adjustment Factor - RAAF Recovery Amount Allocation	\$16,230,213										
Incremental Costs (D.P.U. 19-04, DPU 1-5, Columns K & O)	\$2,244										
Residential Assistance Adjustment Factor - RAAF Recovery Amount Allocation, plus incremental costs	\$16,232,457	\$423,355	\$10,476,421	\$1,148,401	\$1,383,731	\$913,717	\$311,614	\$175,017	\$419,766	\$299,190	\$681,245
Schedule 3 Sales Volumes--November 2018-October 2019		385,429	25,957,943	3,102,173	5,492,381	3,440,647	820,424	505,801	2,303,157	1,683,435	2,404,560
Schedule 3 Transportation Volumes--November 2018-October 2019				44,564	461,006	862,788	1,210,010	9,453	124,033	668,985	3,461,586
Schedule 3 Total Volumes--November 2018-October 2019		385,429	25,957,943	3,146,737	5,953,387	4,303,435	2,030,434	515,254	2,427,190	2,352,420	5,866,146

**RATE SECTOR RATE CALCULATION**

		Residential Sector	G-40 & G-50	G-41 & G-51	G-42 & G-52	G-43 & G-53
Final Distribution Target Revenue	\$242,311,452	162,707,375	19,755,441	26,921,863	18,105,773	14,821,000
Allocation**		67.148%	8.153%	11.110%	7.472%	6.117%
Residential Assistance Adjustment Factor - RAAF Recovery Allocation (MMBtu)	\$16,232,457	\$10,899,775	\$1,323,418	\$1,803,497	\$1,212,907	\$992,860
Schedule 3 Sales Volumes--November 2018-October 2019		26,343,372	3,607,974	7,795,538	5,124,082	3,224,984
Schedule 3 Transportation Volumes--November 2018-October 2019		0	54,017	585,039	1,531,773	4,671,596
Schedule 3 Total Volumes--November 2018-October 2019	\$52,938,375	26,343,372	3,661,991	8,380,577	6,655,855	7,896,580
Billing Rate per Dth	\$0.3066	\$0.4138	\$0.3614	\$0.2152	\$0.1822	\$0.1257
Billing Rate per Therm	\$0.0307	\$0.0414	\$0.0361	\$0.0215	\$0.0182	\$0.0126

\* Schedule 11 Compliance Filing  
\*\* M.D.P.U. No. 252, 2.03