

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF QUESTAR GAS COMPANY TO
INCREASE DISTRIBUTION NON-GAS
RATES AND CHARGES AND MAKE
TARIFF MODIFICATIONS

Docket No. 07-057-13

**DIRECT TESTIMONY OF STEVEN R. BATESON
FOR QUESTAR GAS COMPANY**

December 19, 2007

QGC Exhibit 8.0

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Steven R Bateson. My business address is 1467 Wilton Way, Salt Lake City, Utah.

Q. By whom are you employed and what is your position?

A. I am self-employed and have been retained by Questar Gas Company (Questar Gas or Company) as an independent consultant to the Regulatory Affairs department.

Q. Attached to your written testimony are QGC Exhibits 8.1 through 8.7. Were these prepared by you or under your direction?

A. Yes.

Q. What are your qualifications to testify in this proceeding?

A. I have listed my qualifications in QGC Exhibit 8.1.

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

A. I describe the Company's calculations and recommendations with regard to specific aspects of the class cost-of-service study presented by Mr. Robinson in this case. The specific studies I will sponsor are the Distribution Plant Factor Study, the Distribution Throughput Factor Study and the Peak-Day Factor Study. I will also discuss three specific rate-design proposals, the basic service fee (BSF), the transportation administrative charge and the transportation demand charge.

Q. Did you participate in the Cost-of-Service and Rate Design Task Force ordered by the Commission in Docket No. 02-057-02?

A. Yes. I was an active participant on behalf of the Company from the third meeting to the conclusion of the Cost-of-Service and Rate Design Task Force (Task Force).

Q. Were the cost-allocation studies you are presenting in this case discussed in the Task Force?

A. Yes. The three allocation studies I will present are the Distribution Plant Factor Study, the Peak-Day Factor Study and the Distribution Throughput Factor Study. The Distribution

28 Plant Factor Study was discussed extensively, while the other two studies were discussed, but
29 not as extensively.

30 **II. COST-OF-SERVICE METHODOLOGY**

31 **A. *Distribution Plant Factor Study***

32 **Q. Will you please describe the Distribution Plant Factor Study?**

33 A. The Distribution Plant Factor Study is an analysis of distribution plant installed to provide
34 service to customers in each rate class. The types of distribution plant analyzed are meters,
35 regulators, service lines and small diameter main lines (6 inches and smaller in diameter).
36 The Distribution Plant Factor Study uses a non-proportional stratified random sample of
37 active meters to measure the average investment for each plant category. Studies of this
38 nature have been a central aspect of the Company's Cost of Service (COS) studies since the
39 mid-1960's.

40 **Q. Please describe the aspects of the Distribution Plant Factor Study that have been**
41 **modified from past studies as a result of the Task Force collaboration.**

42 A. A number of aspects of the Distribution Plant Factor Study were discussed at great length in
43 the Task Force. This is not surprising due to the importance of the Distribution Plant Factor
44 in the Company's COS study. Approximately 70% of distribution non-gas cost (DNG) is
45 ultimately allocated using this factor. The Distribution Plant Factor Study has historically
46 been based on an analysis of installed plant, calculated from a random sample of the active
47 meters installed in the Company's Utah service territory. In the Task Force, the Committee
48 of Consumer Services (Committee) advocated a material change to this procedure. The
49 Committee suggested the Company should: 1) include the entire population of large
50 industrial customers; 2) establish the quantity of plant associated with only those customers;
51 and 3) attribute the balance of the distribution plant to the customers served under the
52 remaining rate schedules. This amounts to a subtractive approach to cost allocation. When a
53 subtractive approach is used, the quality of the data becomes critical. Any bias, high or low,
54 will translate directly into an over or under allocation of costs to the remaining customers.

55 **Q. Has the Company followed this recommendation?**

56 A. We have adopted one aspect of this approach. The Company's Distribution Plant Factor
57 Study includes the entire population of the largest meters installed at the time the sample was
58 drawn, but also includes meters from all of the other meter-rating strata. This allows for a
59 less biased analysis of the distribution plant associated with all customers. The advantage of
60 including all meter types in the sample is that it reduces the impact of any measurement error
61 on the outcome. While the methodology for measuring the facilities and establishing the cost
62 basis remains important, it becomes far less critical than would be the case with a subtractive
63 approach. By including all meter types in the stratified sample, the fully weighted results
64 will better reflect the proportion of plant installed to serve each rate class.

65 **Q. Why did the Company over-sample the industrial-type meters?**

66 A. We adopted this approach to address the Committee's suggestion that there was greater
67 potential for sampling error with the largest meters. We recognized there was some merit
68 with this concern.

69 **Q. Are there other aspects of the Distribution Plant Factor Study that have been
70 modified as a result of the Task Force?**

71 A. Yes. The traditional method of establishing the investment in plant for the distribution
72 facilities identified in the study was to use average book cost for that specific size and type of
73 facility. While this approach worked well historically, a number of influences have resulted
74 in this approach producing intuitively odd intermediate results. These influences include: 1)
75 the high level of cost inflation that has occurred during the last 35 years; 2) the transition
76 from a primarily steel distribution system to a hybrid system with both high-pressure steel
77 and lower-pressure plastic pipe; and 3) changing accounting practices resulting in less
78 detailed cost data on each size of facility. The Committee pointed out some of the resulting
79 inconsistencies and suggested that current cost levels be substituted for booked-cost data in
80 developing the factor.

81 **Q. Has the Distribution Plant Factor Study been modified to address this concern?**

82 A. Yes. The Company adopted the Committee's recommended solution. The Distribution Plant
83 Factor Study uses current cost levels for pricing the plant used to develop the relative levels

84 of distribution plant investment by class. This modified approach yields results that are both
85 consistent with past studies and appear to be a reliable measure of the distribution plant
86 installed to serve customers in each rate class. The resulting factor is used to allocate the test
87 period COS. Therefore, using current cost data does not increase the amount of costs
88 recovered in rates.

89 **Q. Please describe how the Distribution Plant Factor is developed.**

90 A. The Distribution Plant Factor begins with a non-proportional stratified random sample of
91 installed meters to determine the amount of plant installed for each meter type. QGC Exhibit
92 8.2, page 2, is a summary of the sample design. Column A, lines 5-22, lists the meter
93 groupings used to stratify the population, column B, lines 5-22, shows the strata populations
94 at the time the sample was drawn and column C, lines 5-22, shows the sample size by strata.
95 Columns D through K break out the sampled meters in terms of geographic distribution and
96 the spread between the general service class and the non-general service classes. As seen on
97 QGC Exhibit 8.2, page 2, meters are stratified by nominal capacity. The entire population of
98 meters with nominal capacity of 16,000 cubic feet per hour (CFH) and greater were included
99 in the sample. The three categories of plant investment calculated through the study are the
100 main lines, service lines and meter sets, including individual customer regulation.

101 **Q. How was the amount of plant required to serve customers estimated?**

102 A. Each meter selected in the sample was evaluated using information from the Company's
103 customer care and billing system (CC&B), engineering files, and the graphical information
104 system (GIS). Based on current cost estimates, the costs to reproduce the meter set, service
105 line and the portion of main line attributable to the sampled meter were determined.

106 **Q. How did you determine the amount of main line attributable to the sampled meters?**

107 A. The study examines the main line directly connected to the service line serving a sampled
108 meter. The study examines the main line within 1,000 feet of a service tap point. Usually
109 this translates into 500 feet in each direction. The length of each size of main line within the
110 1,000 feet is recorded, along with the number of service taps within the 1,000 feet. QGC
111 Exhibit 8.2, page 3, shows the map from the GIS for an individual sampled meter. The map
112 for this sampled meter, designated Sequence ID #17, includes the measurements for main

113 (1,000 feet of two-inch main line, with 20 service taps), and service line (97 feet of half-inch
114 service line). The main line attributable to this meter (1,000 feet/20 taps, or 50 feet) is then
115 priced at current cost.¹ The cost associated with the identified main line divided by the
116 service line taps is included in the Distribution Plant Factor Study.

117 **Q. Why was 1,000 feet selected for the main line measurements?**

118 A. 1,000 feet was selected as the measured length in order to capture the character of the area
119 surrounding a customer, including street crossings. Experience has shown that longer
120 measurement lengths have a tendency to include dissimilar neighborhoods while shorter
121 lengths tend to capture too few or no intersection crossings. Also, the effort required to
122 perform this analysis increases substantially as the measurement length increases. One
123 thousand feet produces reliable information regarding the size of mains installed in the
124 vicinity of a customer as well as the local density of customers attached to the same main.
125 Additionally, the use of 1,000 feet is consistent with the methodology employed since the
126 early 1980's.

127 **Q. How is the service line cost determined?**

128 A. The length and size of service line for each sampled meter is recorded. For the sampled
129 meter shown on QGC Exhibit 8.2, page 3, the service line associated with this meter was 97
130 feet of half-inch pipe. The length of service line is then multiplied by current cost for the
131 identified pipe size.

132 **Q. How are the meter and regulator costs determined?**

133 A. For each active meter installed in the system, a comparable model is identified. The current
134 cost for the comparable model, along with standard ancillary facilities, was determined.
135 These current cost amounts are then assigned to the sampled meters.

136 **Q. How were the current cost levels established?**

137 A. The current cost estimates were provided by distribution engineering. The current costs for
138 intermediate-high-pressure (IHP) main and service lines are based on the actual pricing in

¹ The only exception is that if main with a diameter greater than six inches is found in the sample, the excess cost above the cost of six-inch main line is excluded. These excess costs are allocated using the Distribution Throughput Factor that is discussed below.

139 effect for 2007, weighted by the footage installed in 2006. The current costs for high-
140 pressure service lines are based on recent actual projects. The current costs for meter sets are
141 based on current engineering estimates for standard meter sets of like size. Exhibit 8.2, page
142 4 lists the current cost data for main, service line and meter sets used to price the facilities
143 identified through the sample measurements.

144 **Q. How is the sample used to establish the small diameter main investment by rate**
145 **class?**

146 A. QGC Exhibit 8.2, page 5, shows the calculation of plant investment for small diameter mains
147 for each rate class. Column B, lines 1-26, shows the average investment in mains by nominal
148 rating at current cost. These average values are multiplied by the number of active meters in
149 each rate class. The product of these calculations is shown in columns C through I, lines 1-
150 26. The total for each rate class is shown on line 27. The sum of the values on line 27 is
151 shown in column J. The total in column J, line 27, represents the total main line investment
152 at current cost attributable to the customers receiving service under the rate classes included
153 in the COS study. The next step is to proportion this total to match the book investment for
154 small diameter mains (column K, line 28). The percentage reduction required to proportion
155 the unadjusted total investment (column J, line 27) to equal the book investment is then
156 applied to the class totals on line 27 to arrive at the adjusted class totals shown on line 28.

157 **Q. How is the sample used to establish the service line investment by rate class?**

158 A. QGC Exhibit 8.2, page 6, shows the calculation of plant investment for service lines for each
159 rate class. Column B, lines 1-26, shows the average investment in service line by nominal
160 rating at current cost. These average values are multiplied by the number of active meters in
161 each rate class. The product of these calculations is shown in columns C through I, lines 1-
162 26. The total for each rate class is shown on line 27. The sum of the values on line 27 is
163 shown in column J. The total in column J, line 27, represents the total service line
164 investment at current cost attributable to the customers receiving service under the rate
165 classes included in the COS study. The next step is to proportion this total to match the book
166 investment for service lines (column K, line 28). The percentage reduction required to

167 proportion the unadjusted total investment (column J, line 27) to equal the book investment
168 is then applied to the class totals on line 27 to arrive at the adjusted class totals shown on line
169 28.

170 **Q. How is the sample used to establish the meter investment by rate class?**

171 A. QGC Exhibit 8.2, page 7, shows the calculation of plant investment for meters for each rate
172 class. Column B, lines 1-26, shows the current cost for each nominal meter rating. These
173 current cost values are multiplied by the number of active meters in each rate class. The
174 product of these calculations is shown in columns C through I, lines 1-26. The total for each
175 rate class is shown on line 27. The sum of the values on line 27 is shown in column J. The
176 total in column J, line 27, represents the total meter investment at current cost attributable to
177 the customers receiving service under the rate classes included in the COS study. The next
178 step is to proportion this total to match the book investment for meters (column K, line 28).
179 The percentage reduction required to proportion the unadjusted total investment (column J,
180 line 27) to equal the book investment is then applied to the class totals on line 27 to arrive at
181 the adjusted class totals shown on line 28.

182 **Q. Why are the plant investment values calculated at current cost proportioned to**
183 **match book cost?**

184 A. This step is required to ensure that no component of plant is given too much weight when
185 combined in the Distribution Plant Factor.

186 **Q. What costs are allocated using the Distribution Plant Factor?**

187 A. The costs allocated using this factor include the rate-base related costs, including return,
188 taxes and depreciation, operating and maintenance expenses related to distribution activities
189 and a portion of administrative and general expense.

190 **Q. What is the result of the Distribution Plant Factor Study?**

191 A. The results are shown in QGC Exhibit 8.2, page 1, column I, lines 1-5. The Distribution
192 Plant Factor Study shows that 98.43% (85.37% + 13.06%) of distribution facilities are
193 installed to serve GS residential and commercial customers, 0.74% are installed to serve
194 large commercial sales customers, 0.18% are installed to serve industrial sales customers and

195 0.65% are installed to serve transportation customers. The percentages calculated based on
196 the 2007 Distribution Plant Factor Study are used for the June 2009 COS study.

197 **B. Distribution Throughput Factor Study**

198 **Q. Please describe the Distribution Throughput Factor Study.**

199 A. The Distribution Throughput Factor Study develops an allocation factor based on the
200 commodity volumes delivered through the IHP distribution system. The factor is developed
201 by identifying customers that are not connected to the IHP system and then subtracting the
202 decatherms delivered to those customers from the commodity throughput numbers.

203 **Q. What costs are allocated using the Distribution Throughput Factor?**

204 A. The costs associated with large-diameter main lines (greater than 6-inches in diameter) are
205 allocated using the Distribution Throughput Factor. These facilities are generally sized for
206 more than just local delivery requirements, and therefore are excluded from the Distribution
207 Plant Factor Study. The Distribution Throughput Factor is designed to reflect the underlying
208 purpose of these facilities. Large-diameter main lines installed within the IHP system are
209 typically designed to move gas from the high-pressure feeder-line system to the smaller
210 distribution lines. These facilities benefit all customers connected to the IHP system. The
211 booked cost of the large-diameter main lines is used to determine the portion of the
212 distribution cost associated with these facilities.

213 **Q. What do the results of the Distribution Throughput Factor Study show?**

214 A. The factor developed from the study is shown on QGC Exhibit 8.3 on line 7, columns B
215 through F. The study shows that some rate classes, such as the Transportation Service rate
216 class, have very few customers connected to the IHP distribution system, while in the case of
217 the General Service classes, nearly all of the customers are served from the IHP system. As a
218 result transportation customers are allocated a relatively small portion of costs associated
219 with large diameter mains.

220 **C. *Peak-Day Factor Study***

221 **Q. What is the Peak-Day Factor Study?**

222 A. The Peak-Day Factor Study attributes responsibility for the design peak day between the rate
223 classes. This factor is used to allocate costs related to the coincident peak demand of
224 customers.

225 **Q. What design peak day is used in developing the Peak-Day Factor?**

226 A. I have used the peak day from the 2007 IRP. The Utah design peak day for 2007, adjusted
227 for known changes, is 1,341,382 Dth. The 2007 design peak day was used to match the
228 customer-specific data used in the Peak-Day Factor Study. The percentages calculated based
229 on the 2007 Peak-Day Factor Study are used for the June 2009 COS study.

230 **Q. How is the Peak-Day Factor calculated?**

231 A. The first step is to determine the portion of the design peak day that can be assigned directly
232 to specific rate classes. The contract demand attributable to customers served under the FT
233 and TS rate classes is removed from the design peak day. The total firm contract demand for
234 these two classes is 194,889 Dth. This is the same quantity that is added for these classes in
235 calculating the design peak day. The balance of the design peak day attributable to the other
236 classes is 1,146,493 Dth. These calculations are shown on QGC Exhibit 8.4, page 2, lines 1
237 through 4.

238 **Q. How is the remaining quantity of design peak day apportioned among the other rate
239 classes?**

240 A. The remaining rate classes are the GSR, GSC and FS rate classes. An analysis of the
241 population for these classes was performed using data from the CC&B to establish the
242 proportionate responsibility for the remaining design peak day. This study involved
243 estimating the contribution to peak for customers grouped by weather zones within the three
244 remaining rate classes. The total estimated design peak day was calculated using individual
245 customer data and was then summed by rate class. The remaining design peak day is
246 allocated between these three classes based on their share of the calculated peak.

247 **Q. How were the contributions to peak calculated for each customer segment?**

248 A. A factor is calculated and recorded in the CC&B for each GS and FS customer with at least
249 six months history representing the level of temperature sensitivity for that customer's use
250 history. This factor has been designated as the linear regression slope (LRS). The LRS is the
251 slope of a line-of-best fit between the individual customer's monthly use and the degree days
252 for the same period. The other factor used is the intercept value associated with the line-of-
253 best fit. This factor has been designated the linear regression intercept (LRI). The units for
254 the LRS are Dth/Degree Day (Dth/DD). The units for the LRI are Dth/day. On any given
255 day the quantity of gas used by an individual customer can be estimated if the LRS, LRI and
256 degree days for the weather zone applicable to that customer are available. For the purpose
257 of calculating the contribution to peak attributable to each customer, the coldest temperature
258 expected by weather zone, based on the 20-year return statistics, was used. Page 3 of QGC
259 Exhibit 8.4 shows the details of the calculation of peak responsibility for the GSC, GSR and
260 FS rate classes.

261 **Q. Please describe the data and calculations shown on QGC Exhibit 8.4, page 3.**

262 A. The data shown on QGC Exhibit 8.4, page 3, is grouped by rate class. The first data
263 grouping, lines 1-4, represents the data for the GSC class. The data for the GSR class are
264 shown on lines 5-8. The data for the FS class are shown on lines 9-12. The data in each
265 grouping are broken out by weather zone as recorded in the CC&B. For example, line 1
266 provides the detailed information for non-residential, general service customers served in the
267 Salt Lake City weather zone. These 49,904 customers are considered by definition to be in
268 the Salt Lake City weather zone. Of these 49,904 customers, 49,132 had sufficient history to
269 calculate the LRS and LRI factors. The total LRS value for these 49,132 customers is
270 3,721.3 Dth/DD. The total LRI value for these 49,132 customers is 9,821.5 Dth/day. Under
271 peak conditions (mean temperature of minus 6 degrees F.), without consideration for
272 diversity, these 49,132 customers can be expected to use 274,036 Dth. This estimate of peak
273 contribution is then increased to reflect the total population in this segment, or 49,904
274 customers. The contribution to peak calculated for these 49,904 customers is 278,342 Dth.
275 This set of calculations is repeated on lines 2-11 for each weather zone of the GSC, GSR and
276 FS class populations.

277 **Q. Does this approach to calculating the peak-day contribution result in an unbiased**
278 **estimation of peak-day responsibility for these rate classes?**

279 A. Yes. This approach treats every customer the same in terms of utilizing the data that best
280 explain customer usage, including temperature sensitivity, base load and expected
281 temperatures under peak conditions. For the small percentage of customers with insufficient
282 history to calculate the LRS and LRI factors, the peak contribution for the other similarly
283 situated customers is proportionately increased to account for the total population.

284 **Q. How does this approach differ from the methodology historically used by the**
285 **Company in its COS study?**

286 A. Historically, an estimate of the load factor for the FS class was used to develop this class'
287 share of the peak day. The minimum load factor of 40% was used as the estimate. The
288 estimated load factor was used to back into a peak-day responsibility for the FS class, and
289 this amount was subtracted from the total. The remaining peak day was assigned to the GS
290 class. In contrast the proposed methodology uses the same factors to calculate the
291 proportionate responsibility for peak day for the GSR, GSC and FS rate classes, which yields
292 an unbiased allocation factor.

293 **Q. What are the results of the Peak-Day Factor Study?**

294 A. The results are shown on page 1, line 2 of QGC Exhibit 8.4. Also shown on line 4 are the
295 resulting class load factors. This shows that the residential portion of the GS class has an
296 average load factor of 23.00%, the commercial portion of the GS class has an average load
297 factor of 21.38% and the FS customers have an average load factor of 47.47%.

298 **III. RATE DESIGN**

299 **Q. What aspects of the Company's rate-design proposal are you presenting?**

300 A. I will describe the Company's proposals for basic service fees, transportation administration
301 charge and the demand charge applicable to transportation customers requiring firm service.

302

A. Basic Service Fee

303 **Q. What is the purpose of the basic service fee in the Company's rate design?**

304 **A.** The basic service fee (BSF) is comparable to the customer charge element of a generic rate
305 design. The BSF is scaled for different size customers, as reflected in the installed capacity
306 of the meter. The BSF allows for the collection of a portion of customer costs directly from
307 the customers responsible for those costs. Only costs that can be associated with individual
308 customers are included in BSF. Because only a portion of the customer related costs are
309 included in the BSF, the balance of customer related costs are collected through usage
310 charges, typically in the first block.

311 **Q. Have you followed the approach used by the Company historically?**

312 **A.** For the most part, yes. There are three deviations from past practice. I am proposing to
313 include an additional BSF category. This new category covers meters serving individually-
314 metered residential apartments. The individually-metered apartments tend to have a lower
315 investment in main and service line than other small customers. The lower investment
316 results from the sharing of a single service line and slightly higher density on the IHP system.

317 **Q. What is the second deviation from past practice you referenced?**

318 **A.** The second change is to include a small portion of main in the BSF calculation for all
319 customers as opposed to just interruptible customers. I am proposing to include
320 approximately 50% of the average investment in main in the BSF calculation. This is
321 justified since nearly every customer requires some main. The exception to this rule involves
322 customers receiving high-pressure service. In the case of those customers, essentially no
323 main is involved in delivering their requirements. Most of the meters connected directly to
324 the high-pressure system are included in BSF category Type V, as described later in my
325 testimony. Another motivating factor is the combination of interruptible and firm
326 transportation customers into one rate class.

327 **Q. What is the impact on the BSF calculation of including main in the calculation?**

328 **A.** I have prepared three separate BSF studies to illustrate the impact of varying the amounts and
329 types of plant in the calculation. Pages 1-3 of QGC Exhibit 8.5 contain these three studies.
330 Page 1 shows the Company's recommended calculation of the BSF amount for the five

331 category Types. Page 1 shows the BSF calculations using approximately 50% (column B) of
332 the average plant investment for service line, main and meter. Page 2 shows a similar
333 calculation using about two-thirds of the average investment in service lines and meters and
334 about one-third of the average investment in main. Page 3 shows the results of including
335 almost 100% of service line and meter and no main. For purpose of comparison, the three
336 studies have been adjusted to derive the exact same annual dollar amount for the Type II BSF
337 category. In all three studies, the BSF monthly amounts have been rounded to the nearest
338 half dollar for Category Type I & II and the nearest dollar for the other categories. This
339 comparison shows that the proposed level of BSF can be supported using the proposed
340 methodology or the methodology that the Commission has adopted in the past, with no main
341 being included. The Company believes that including a portion of main cost is more
342 reflective of costs incurred in providing service.

343 **Q. What is the third change from past practice?**

344 A. The meter capacity ranges that define which BSF category apply have been adjusted based on
345 the underlying cost study. The range for the Type I & II categories has been extended to
346 include meters with capacity of 1,000 CFH. The Type III category applies to meters with
347 capacities between 1,001 CFH and 23,000 CFH. The Type IV category applies to meters
348 with capacities between 23,001 CFH and 60,000 CFH. The Type V category includes meters
349 with capacity greater than 60,000 CFH. In addition meters served with full IHP line pressure
350 are included in Type IV and meters served at high pressure are included in Type V. These
351 new definitions were determined by grouping meters with similar cost characteristics
352 together.

353 **Q. Why are you proposing these specific levels of BSF charges?**

354 A. The relative level of recovery of customer costs through fixed charges does not lend itself to
355 a single definitive solution. There are many considerations that guide the decision. The four
356 primary considerations are: 1) how the resulting combination of BSF charges and block rates
357 compare to the cost curve for each rate class; 2) diversifying the method of recovery of
358 customer costs between fixed charges and volumetric rates tends to smooth the transition
359 between the discrete BSF categories; 3) including too few customer-related costs in the fixed

360 charge results in intra-class subsidies between the large and small customers in a given rate
361 class; and 4) including too much of the customer-related costs in the fixed charge can result
362 in individual customers overpaying customer-related costs. There is a fine balance between
363 these competing interests. In combination, the addition of the new apartment category, the
364 redefinition of capacity ranges, the placement of special-pressure services in the categories
365 with similar cost structure and the inclusion of only half of the customer-related investment
366 for each of the three distribution plant types, as summarized on page 1 of QGC Exhibit 8.5,
367 result in BSF charges that are within a reasonable range.

368 ***B. Transportation Administrative Charge***

369 **Q. The transportation administrative charge was specifically listed as an issue to be**
370 **addressed by the Task Force. Did the Task Force reach a consensus regarding the**
371 **transportation administrative charge?**

372 A. No. There was much discussion, but no consensus. Some customers like higher up-front
373 charges and lower usage rates. Others would like to enjoy the benefits of transportation, but
374 the high fixed charge can present a barrier. I have looked at the costs traditionally included
375 in the transportation administrative charge, and I have also looked at the burden new
376 transportation customers would bring with them if they became transportation customers. I
377 am proposing a transportation administrative charge that covers both the incremental costs of
378 new transportation customers and a share of the fixed costs all transportation customers
379 cause. The cost analysis includes the same cost components historically used to establish the
380 transportation administrative charge. The only significant change from past studies is the
381 reduction of costs associated with industrial customer representatives. These costs were
382 reduced by 50% to reflect the reality that these employees would continue to have some
383 responsibility for working with the industrial customers in the absence of transportation.

384 **Q. What transportation administrative charge are you proposing?**

385 A. The administrative charge for the first transportation account is proposed to be reduced from
386 \$6,800 to \$4,500. The administrative charge for additional transportation accounts involving
387 the same entity is proposed to be reduced from \$2,550 to \$2,250. I am also proposing that
388 these same transportation administrative charges apply to the MT rate class. QGC Exhibit

389 8.6, page 1, details the cost components included in the transportation administrative charge;
390 page 2 details the incremental analysis. The proposed combination of transportation
391 administrative charges will allow the Company to recover a reasonable level of the cost of
392 providing the extra transportation services directly from the customers responsible for those
393 costs.

394 **C. *Transportation Firm Demand Charge***

395 **Q. Why is the Company proposing to institute a demand charge for firm**
396 **transportation customers?**

397 A. This was a specific request received during the Task Force collaboration. The existing firm
398 transportation rate requires transportation customers desiring firm service to maintain a load
399 factor of 50% or greater. This excluded a number of customers that could not meet this
400 requirement. The alternative for these customers was to take a portion of their load on a firm
401 sales rate, or to sign up for backup service under the Company's F-3 rate. The F-3 rate was
402 designed to provide backup service for sales customers. Transportation customers have
403 shown a preference for taking 100% of their service on a transportation rate.

404 **Q. How is the demand charge for transportation service calculated?**

405 A. The total demand related costs allocated to the transportation TS rate class is divided by the
406 total of the daily contract limits for the class. The resulting value is divided by 12 to arrive at
407 a monthly demand charge. This calculation is detailed on QGC Exhibit 8.7. Each customer
408 taking service under the TS schedule will be required to specify a daily firm contract
409 requirement. The monthly transportation demand charge will be multiplied by the firm daily
410 contract requirements for each TS customer.

411 **Q. Does this conclude your direct testimony?**

412 A. Yes.

State of Utah)
) ss.
County of Salt Lake)

I, Steven R. Bateson, being first duly sworn on oath, state that the answers in the foregoing written testimony are true and correct to the best of my knowledge, information and belief. Except as stated in the testimony, the exhibits attached to the testimony were prepared by me or under my direction and supervision, and they are true and correct to the best of my knowledge, information and belief. Any exhibits not prepared by me or under my direction and supervision are true and correct copies of the documents they purport to be.

Steven R. Bateson

SUBSCRIBED AND SWORN TO this ____ day of December 2007.

Notary Public