Docket No. 25-057-06
FEA Data Request No. 2.03
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.03: Please provide a narrative as to how the Company designs the capacity of its distribution main system to meet the peak natural gas demand of its customers.

Answer: The Company designs the capacity of its distribution main system to meet peak natural gas demand by leveraging a combination of historic customer usage data and ambient temperature metrics, specifically Heating Degree Days (HDD). Customer usage patterns are analyzed and correlated with HDD values to understand temperature-dependent demand. This data is then extrapolated to a Design Day HDD, which represents a statistically derived coldest day based on decades of historical temperature records.

In addition to temperature-driven demand, the Company incorporates firm contract demands from transportation customers into the Design Day forecast. These combined demand projections are used to model the distribution system using hydraulic modeling software, which evaluates system pressures, flows, and velocities across the entire network.

The modeling process also includes gas supply inputs from upstream transmission partners to ensure a comprehensive analysis. Based on the results of this annual peak day design model, the Company identifies and recommends system improvements to maintain reliability and meet customer needs during peak demand conditions.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst

Docket No. 25-057-06
FEA Data Request No. 2.04
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.04: Does the Company use the Design Day Demand of its customers to design the capacity of its distribution main system? Please explain your response.

Answer: Yes. Refer to the Company's response to FEA 2.03.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst

Docket No. 25-057-06
FEA Data Request No. 2.05
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.05: Does the Company use the number of customers on its system to design its distribution main system? Please explain your response.

Answer: System design is based off temperature and contract-dependent demand on a design day. The number of customers is not an influential part of the design process.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst

Docket No. 25-057-06
FEA Data Request No. 2.06
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.06: Does the Company use the system load factor and/or class load factors to design the capacity of its distribution main system? Please explain your response.

a. Please provide an estimate of the variation of capacity factor on the Company's transmission main, seasonally, throughout the year.

Answer: No. The Company does not use system load factor and/or class load factors to design the capacity of the distribution main system. The Company is not familiar with the term 'Capacity Factor' and does not use it to design the distribution main system.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst

Docket No. 25-057-06
FEA Data Request No. 2.08
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.08: Does the Company use the total usage of its system to design the capacity of its distribution main system? Please explain your response.

Answer: No. The Company does not use the total actual usage to design the capacity of the distribution main system. See response to FEA 2.03 for how the Company designs the distribution main system.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst

Docket No. 25-057-06
FEA Data Request No. 2.09
Requested by the Federal Executive Agency
Date of EGU Response: September 2, 2025

FEA 2.09: Does the Company agree that the system of mains must have enough capacity to meet the expected Design Day Demand of its customers? Please explain your response.

Answer: Yes. Each year, the hydraulic model results are used to identify resultant modeled pressures in Design Day conditions and those results are used to report the adequacy of the system to meet expected Design Day demand. See FEA 2.03.

Prepared by: Jeff Roberts, Supervisor Gas Distribution Engineering
Jordan Parks, Regulatory Analyst