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October 27, 2011

Ms. Kate Whitney  
Montana Public Service Commission  
1701 Prospect Ave.  
P. O. Box 202601  
Helena, MT 59620-2601

RE: Docket D2011.5.36  
NWE's Responses to PSC Set 1 001-010 Data Requests

Dear Ms. Whitney:

Enclosed please find one copy of NorthWestern Energy's Responses to PSC Set 1 001-010 Data Requests. The responses are being mailed to the service list in this docket and e-filed with the PSC.

Sincerely,

A handwritten signature in cursive script that reads "Connie Moran".

Connie Moran  
Administrative Assistant  
Regulatory Affairs

NC/nc  
Attachments  
CC: Service List

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of NorthWestern Energy's Data Responses to PSC Set 1 001-010 Data Requests in Docket No. D2011.5.36 will be e-filed with the PSC. It will also be served upon the following persons by, postage prepaid via first class mail, as follows:

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DATED this 27<sup>th</sup> day of October 2011.

*Connie Moran*

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Docket D2011.5.36  
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PSC Set 1 (001-010)

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PSC-001

Regarding: Transportation Discounts, GTAC Offsets  
Witness: Phelps

- a. In Exhibit\_(GDP-2), page 5, the TBU firm transportation discount revenue impact is shown to be \$(512,082). Please provide an explicit derivation of this number.
- b. For each customer receiving a firm transportation discount, please specify the measure of discount for each rate in the tariff.
- c. For each customer receiving an interruptible transportation discount, please specify the measure of discount for each rate in the tariff.
- d. For each customer receiving a firm or interruptible transportation discount, please describe the rationale for the discount, and the calculation of the discount. The description should include the estimated costs of bypass to the customer and to the utility, and any other costs or benefits considered in the decision to offer discount.
- e. For each offset on page 5 that was derived under Orders 7046g & 7046h, please provide all relevant assumptions and calculations used in its derivation.

**RESPONSE:**

- a. The (\$512,082) represents the difference between the discount currently in rates and the actual discount for EnergyWest, the firm TBU customer that was on the discounted rate. The amount of the difference is due to timing. The discount was terminated effective April 1, 2010 because EnergyWest's bypass opportunities were no longer economically viable. EnergyWest is currently paying the full tariff rate. However, the rates set in D2007.7.82 remained in effect until they were reset with the Commission's final order in Docket D2009.9.129, resulting in an over-collection of (\$512,082).
- b. In Docket D99.8.176, Order No. 6197c the MPSC approved Stipulation 2 between NorthWestern's predecessor, the Montana Power Company, and EnergyWest, a TBU customer. The approved stipulation afforded EnergyWest a discount on its natural gas transportation bill. As noted in part a, above, EnergyWest has been paying the full rate since the discount ended April 1, 2010.

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PSC-001 cont'd

Montana Tech is a firm DBU customer that had the ability to bypass the natural gas distribution system and take service directly from the transmission system.

The heating plant at Montana Tech is located approximately 1,400 feet from NorthWestern's high-pressure natural gas transmission line. The estimated cost to bypass NorthWestern's natural gas distribution system was \$135,000. NWE's Compliance filing in response to Order 7046h includes MDDQ of 419 Dkt for Montana Tech at a rate of \$3.068/Dkt.

- c. There are none.
- d. Refer to part b, above.
- e. The offset revenues are the amounts reflected in the then-current approved revenue requirement from a general rate filing. This base offset amount is only adjusted when the Commission approves delivery rates from a general rate filing. The off-system, interruptible and CMPL revenues are revenue credits to the approved revenue requirement. The offset revenue amount is the basis to compare to actual revenues to determine whether revenues were under- or over- collected for the current tracking year. If actual revenues exceed the base offset amount at the end of the tracker year, customers will be given a credit through the GTAC rate. If actual revenues fall below the base offset amount, the difference is recovered from customers through the GTAC rate. The total offset revenue amount of \$1,222,125.87 was based on a combination of dockets and orders, as shown on the worksheet on the attached CD. The worksheet details the offset revenues by month for the tracking period and identifies the Docket No. and approved Order No. that applies.

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PSC-002

Regarding: TBU Interruptible Transportation Revenues and IT Tariff  
Witness: Phelps, parts a & b / Unknown, parts c, d, e

- a. In Exhibit\_(GDP-2), page 5, the TBU On-System interruptible transportation revenue is shown to be \$748,198, a figure that appears to be significantly greater than the expected value of \$424,767. If possible, please provide a probable explanation for this departure from expectation.
- b. In Exhibit\_(GDP-2), page 5, the TBU Off-System interruptible transportation revenue is shown to be \$429,484, a figure that appears to be significantly less than the expected value of \$703,003. If possible, please provide a probable explanation for this departure from expectation.
- c. Please specify all instances in the last ten years where TBU On or Off-System IT customers have been interrupted, and the reason for each interruption.
- d. Please describe the location and other relevant characteristics of any probable capacity constraints on the transmission system under design day conditions.
- e. Please describe the rationale for retaining a TBU interruptible transportation tariff, including reference to any capacity constraints from (d), any applicable federal regulations, and any benefits obtained or costs avoided through service under the IT tariff, which could not be realized through service under the existing FT tariff.

**RESPONSE:**

- a. The \$424,767 figure represents the Interruptible TBU On-System revenue in rates for the tracker year. Interruptible TBU On-System customers shipped more natural gas than was in the combined approved revenue requirements, resulting in an over-collection of Interruptible TBU On-System revenue. This increment of the GTAC transmission rate is credited back to all on-system transmission customers through the net 2011-2012 GTAC transmission rates. See also the response to part b, below.
- b. The \$703,003 figure represents the Interruptible TBU Off-System revenue in rates for the tracker year. Interruptible TBU Off-System customers shipped less natural gas than was in the combined approved revenue requirements, resulting in an under-collection of Interruptible TBU Off-System revenue. This increment of the GTAC transmission rate is charged to all on-system transmission customers through the net

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2011-2012 GTAC transmission rates. When all the components are taken into account (actual revenues, offsets and discounts) the 2011-2012 GTAC transmission rate results in a credit to customers.

The following responses to parts c, d, and e have been provided by NWE's Gas Transmission and Storage Department. No witness is available in this natural gas tracking case docket to sponsor this information.

- c. TBU On and Off-System IT customers were interrupted on February 25, 2003; January 5, 2004; January 13, 2005; January 14, 2005; December 14, 2008 and December 15, 2008. These interruptions were necessary due to extremely cold weather. Interruptible gas transportation service to the Dave Gates Generating Station was also interrupted from 6 a.m. to 6 p.m. on February 1, 2011 due to cold weather.
- d. On a system-wide basis under design day conditions, NWE is at or very near system capacity. The system load on design day is comprised of core and firm natural gas customers with interruptible natural gas flow at zero. Available pipeline capacity above this point varies based on supply and load location (i.e., The Aden line has available capacity if supply is available in Canada; however, incremental supply from Aden to Missoula requires system additions due to downstream pipeline capacity constraints.). Detailed analysis must be performed for any additional capacity request, regardless of size, on a case-by-case basis to determine the effect and feasibility of the additional load during design day.
- e. The TBU interruptible transportation tariff provides customers an option for obtaining service for loads that do not require firm service. There are customers with back-up fuel systems, customers with the ability to curtail natural gas use during cold weather events and customers that do not use natural gas during the winter that benefit from having the option of interruptible service. Interruptible service also benefits firm customers through the crediting of interruptible revenue to this class of customers.

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PSC-003

Regarding: Battle Creek  
Witness: Smith

- a. On page JMS-8 of your testimony you state that NWE intends to submit a Battle Creek revenue requirement filing in 2011. Is that still NWE's intention? When exactly does NWE plan to submit that filing?
- b. NWE acquired its current interest in Battle Creek through two separate transactions in 2010. Does NWE have any intention to purchase an additional part of Battle Creek in the near future?

**RESPONSE:**

- a. Yes. NorthWestern is in the process of preparing this filing, but does not have a firm filing date given the existing regulatory workload.
- b. Not at this time.

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PSC-004

Regarding: Transmission U&UAF  
Witness: Smith, part a / Unavailable, part b

Exhibit JMS-1, page 1 indicates that Transmission U&UAF was approximately 507,792 dkt during the 2010/2011 tracker period. How does that figure compare to the past five years? Is that amount within ranges other regional utilities experience? What if anything can NWE do to reduce this figure?

**RESPONSE:**

This response is provided in two subparts.

- a. NWE's Transmission U & UAF is calculated to be 2.46% of the volume delivered by the natural gas Transmission system. For NWE (Energy Supply) that is 2.46% of the volumes delivered to all of NWE's city gate stations consistent with Natural Gas Tariff Schedule No. T-FTG-1 (Transportation Business Unit Firm Transportation Natural Gas Service). The following table illustrates the Transmission U & UAF that has been filed in the last five annual natural gas tracking case filings:

<u>Docket Number</u>	<u>Transmission U &amp; UAF (Dkt)</u>
D2007.5.44	471,844
D2008.5.44	480,282
D2009.5.63	489,577
D2010.5.49	504,125
D2011.5.36	507,792

- b. The following portion of this response regarding whether the 2.46% U & UAF is within ranges other utilities experience and what, if anything, NWE can do to reduce this figure is provided by NWE's Gas Transmission and Storage Department. No witness is available in this natural gas tracking case docket to sponsor this information.

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The only other regional utility where NWE has knowledge of the Transmission U & UAF percentage is Montana Dakota Utilities, and their current percentage is 3.621%. The U & UAF value at NorthWestern Energy is monitored on a monthly basis by natural gas measurement personnel. This value is used to find anomalies in the natural Gas Transmission System ("GTS") such as meter problems, calibration issues, and potential pipeline leaks.

Further, the natural gas transmission group manages the unaccounted for by performing annual (or more frequent as per contract) meter calibrations and line patrols. The meter calibrations are intended to maintain accurate flow meters. The annual line patrol includes leak surveys.

City gate heaters and transmission compressors are significant uses of natural gas on the GTS. The city gate heater consumption is kept to a minimum by temperature control equipment that is used to ensure heaters are only used when natural gas temperatures fall below predefined values. Compressor operations are monitored by natural gas control and by field personnel. Compressors are only used when needed and are monitored to match supply and load as closely as possible. Also, the compressors are maintained by competent staff for efficient operations thus minimizing compressor fuel natural gas requirements.

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PSC-005

Regarding: DSM Lost Revenues  
Witness: W.M. Thomas

On page WMT-15 of your testimony you indicate that DSM Lost Revenues for the 2010-11 tracker period are \$553,828. The 12-month forecast amount of Lost Revenues for the 2011-12 tracker period is \$969,667. Please detail and provide your calculation for this estimate. A response should include estimated number of participants, dkt savings and lost revenues for each of the specific Natural Gas DSM Programs.

**RESPONSE:**

Detailed calculations are provided in the electronic copy of Exhibit \_\_ (WMT-3) Natural Gas DSM Lost Revenues 2011-12 with backup (redacted).xls on the CD attached to the response to Data Request PSC-001(e). Total reported energy savings for this forecast period are equal to the annual goal of 210,000 Dkt, as shown in cell N7 on Tab 3 of the workbook. This amount represents the overall annual goal for the natural gas DSM Program Portfolio (including contribution from USB-funded programs), but NorthWestern does not make forecasts of future savings or set goals by individual DSM program. Similarly, NorthWestern only computes Lost Revenues based on the total savings achieved (or expected) by the entire portfolio of natural gas DSM Programs in a given historical or future tracker period, and not by each respective individual program.

Participant counts for the 2010-11 historical tracker period can be viewed by inspecting the detailed program records provided in the many worksheet tabs of this workbook, with the exception of Weatherization Events and customer participation in Northwest Energy Efficiency Alliance ("NEEA") activities and initiatives. The Weatherization Events had 9,463 participants in 2010 and 3,523 in 2011. Because NEEA activities are directed at market transformation and market intervention, NEEA does not report participant counts to NorthWestern. NorthWestern does not forecast numbers of expected participants in each program in any future period.

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PSC-006

Regarding: DSM Savings  
Witness: W.M. Thomas

On page WMT-3 of your testimony you include Table 1 detailing the reported savings from DSM programs. Can you explain specifically what led to reported DSM dkt savings to increase by over 144% between the 2008-09 tracker year and the current 2010-11 tracker year, when it has been relatively constant prior to that?

**RESPONSE:**

NorthWestern disagrees that reported energy savings has been relatively constant prior to the 2010-11 tracker year. Table 1 on page WMT-3 indicates a clear trend of annual increases in reported natural gas DSM savings. The higher reported savings for the 2010-11 tracker year are, in large part, the result of three natural gas DSM programs that were introduced in April 2009 near the end of the 2008-09 tracker period:

- E+ Residential New Construction Gas Rebate Program
- E+ Commercial Existing Construction Gas Rebate Program
- E+ Commercial New Construction Gas Rebate Program

These programs have gained a degree of customer acceptance and participation since their inception.

The E+ Residential Existing Construction Gas Rebate Program showed higher reported energy savings due to results from the Weatherization Events and the Green Blocks Pilot Projects in Missoula and Helena.

Additionally, there were increased energy savings from the E+ Business Partners Program, NEEA activities, and the E+ Energy Audit for the Home or Business. The DEQ Appliance Rebate Program, a one-time offering, also contributed to increased reported energy savings.

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PSC-007

Regarding: Capital Structure Used  
Witness: Smith

Exhibit JMS-1 Page 3 of 3, lines 27-37, indicates a capital structure last approved in Docket D2000.8.113. The Stipulation Agreement in Docket D2009.9.129 and Final Order determined that a Capital Structure of 52% Debt and 48% Equity, an authorized ROE of 10.25% and Debt cost of 5.76% became effective January 1, 2011.

- a. Please indicate all changes in the submitted workpapers that the new approved Capital Structure and ROE affect.
- b. Please adjust and indicate any effects on the GTAC and UGCA balances and update to indicate correct balances if necessary.

**RESPONSE:**

- a. Effective January 1, 2011, working storage gas interest was calculated at 11.12% and deferred account interest was calculated at 7.92%. Both of these calculations used the new capital structure. See also the response to Data Request MCC-9.
- b. The new capital structure has no impact on the GTAC balance but does lower the carrying charge on the difference between the actual monthly revenues and costs (deferred account) because the recent authorized return is lower than previously allowed. No adjustments are necessary.

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PSC-008

Regarding: Stipulation Agreement  
Witness: Smith

The previous gas tracker Dockets D2009.5.63 and D2010.5.49 were settled with a Stipulation agreement. Please, on an item by item basis, explain how NWE has complied with that agreement. If there was a non-compliance on a provision, explain why there was non-compliance.

**RESPONSE:**

The parts of the stipulation that required NWE to comply in some manner are listed below. After each section, the current status is added in bold font.

1. NorthWestern will reduce its fixed price swap activity to a maximum of 2 million Dkt per year. For the time period covered by the 2010 natural gas biennial procurement plan, additional swaps will only be done for the heating season months of November to March. The transition will be handled in the following manner:
  - a. No additional swaps will be entered into for the 2010/2011 tracking period;  
**No additional swaps were entered into.**
  - b. For the 2011/2012 tracking period, in order to reach a heating season swaps quantity of 2 million Dkt, additional November - March swaps will be necessary, unless otherwise limited, in the amount of 2,275 Dkt/day, which would equate to a total volume of 343,525 Dkt. 100% of the 2011/2012 swaps can be acquired any time prior to the 2011/2012 heating season;  
**No swaps have been entered into due to an increased utilization of storage.**
  - c. For the 2012/2013 tracking period, in order to reach a heating season swaps quantity of 2 million Dkt, additional November - March swaps will be necessary, unless otherwise limited, in the amount of 7,765 Dkt/day, which would equate to a total volume of 1,172,515 Dkt. 100% of the 2012/2013 swaps can be acquired any time prior to the 2012/2013 heating season; and  
**NWE will consider entering into these swaps between now and November 2012.**
  - d. For the 2013/2014 tracking period, 100% of the existing annual swaps will be expired prior to the heating season. Therefore, the entire 2 million Dkt will need to be acquired for that November - March time period. This will result, unless otherwise limited, to a total daily volume of fixed price swaps equal to 13,245 Dkt/day for the period November through March of each year.  
**NWE will consider entering into these swaps between now and November 2013.**

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2. NorthWestern will not enter into fixed price swaps when the fixed price is greater than \$7.00/Dkt. If fixed price swaps prices rise above \$7.00 per Dkt, NWE's future November – March swaps may not reach the 2 million Dkt target quantity. The parties to this stipulation can agree to modify this price cap.  
**No additional swaps have been entered into at any price.**
3. NorthWestern will document its analysis and decision making process associated with the timing and execution of the fixed price swaps. This documentation will include fundamental analysis of market conditions, trends, weather, and other relevant factors, but it must be noted that this analysis in no way assures that the transaction(s) being contemplated will result in overall lower costs to ratepayers. In addition, NWE agrees during the first year of its 2010 biennial natural gas procurement plan it will survey other U.S. local distribution companies to determine the extent of their hedging activity and the types of hedges that are utilized. NorthWestern will use this information in the development and the presentation of the 2012 natural gas procurement plans.  
**NWE has not entered into any additional swaps. NWE is currently deciding the most appropriate manner to perform this survey analysis.**
4. When NorthWestern files its 2010 Biennial Natural Gas Procurement Plan it shall include a detailed plan for a two-year study on the use of natural gas call options versus fixed price swaps. This study will be intended to analyze all areas that the Commission would need to consider to make the decision whether or not NWE should include natural gas call options as an additional available hedging tool under the 2012 Biennial Natural Gas Procurement Plan.  
**NorthWestern did include a plan for a two-year study in its 2010 Biennial Natural Gas Procurement Plan. NWE is currently gathering the information necessary to perform this analysis. This study will take some time, but any results that are available in late 2012 will be included in NWE's Biennial Natural Gas Procurement Plan filing in December 2012.**

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PSC-009

Regarding: 2010-11 E+ Natural Gas Supply DSM Programs  
Witness: Thomas

On Page WMT-6, Lines 9-12, you state that natural gas savings from operations for the tracker period totaled 186,210 if all program measures were installed and in operation for a full year.

- a. Were all program measures installed and in operation for the full year? Please explain.
- b. What is the process used to determine the actual percentage and point in time the program measures were placed into service?

**RESPONSE:**

- a. No. Customer participation in NorthWestern's DSM programs occurs throughout each program year. There are thousands of measures installed by large numbers of customers. NorthWestern tracks project completion dates and records dates that rebates are paid, but those dates may or may not actually represent the exact date the measure was installed and began producing energy savings. Identifying and tracking the precise moment of installation of each DSM measure is not practical, or likely even possible. The reporting, administrative complexity, and cost of attempting such a feat would be enormous and would either eliminate or substantially reduce the net customer benefits produced by DSM.

Reported energy savings are to be correctly thought of as installed DSM capacity for each measure, program or total DSM portfolio that, when installed and operating for a full year, would produce that reported amount of savings. NorthWestern's DSM annual goal of 210,000 Dkt was established on the same basis (i.e., installed DSM capacity). This annual goal quantifies NorthWestern's objective of influencing customer installation of DSM measures sufficient to produce new, incremental annualized natural gas energy savings equivalent to that goal. Therefore, reported DSM savings (annualized) are directly comparable to annual DSM goals.

For the first year of incrementally acquired DSM, NorthWestern recognizes that first year realized savings will be less than subsequent years, because Year 1 gas DSM measures are installed throughout the DSM program year and are not in place and operating for a full year. This reality becomes important when computing DSM Lost

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Revenues. As a simplifying assumption to enable reasonable estimates of the lost energy transmission and distribution system throughput, NorthWestern uses a "half-year convention" that recognizes only one-half of the incremental new DSM energy savings in Year 1. In effect, this half-year convention assumes that DSM measures are installed uniformly throughout the Year 1 tracker period in equal increments, and only 50% of the installed energy savings capacity (i.e., the DSM savings) is realized in Year 1. The half-year convention is applied to the first year only; in Year 2 and beyond it is assumed that 100% of the installed DSM capacity installed in Year 1 produces savings for the entire annual period. Nexant reviewed this half-year convention in the 2007 DSM Evaluation and found it to be reasonable.

This half-year convention is reflected in the calculations of DSM Lost Revenues in Exhibit \_\_ (WMT-3) (provided in response to Data Request PSC-005), is footnoted on Tab 3 of that Exhibit, and has been standard practice for many years.

- b. Please refer to the response to part a, above.

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PSC-010

Regarding: DSM expenses – costs of operation

Witness: Thomas

- a. Please provide in electronic format the itemized GL entries for the \$2,857,253 expense.
- b. Please update the DSM expenses – costs of operation to actual, and if need be based on those expenses, any estimated expenses for the 2011-2012 tracker year.

**RESPONSE:**

- a. Please refer to file EXHIBIT\_\_(WMT-2) Gas Supply DSM Spending orig.xls provided on the CD attached to the response to Data Request PSC-001(e).
- b. Please refer to file EXHIBIT\_\_(WMT-2) 2010-11 12+0 Gas Supply DSM Spending FINAL 083111.xls provided on the CD attached to the response to Data Request PSC-001(e). Updating the natural gas DSM spending for 12 months of actual recorded expenses resulted in a decrease in total spending from \$2,857,253 (9+3 figure) to \$2,749,631 (12+0 figure). The 2011-12 natural gas DSM budget did not change with this updating and remains at \$2,608,266.