

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

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IN THE MATTER OF Havre Pipeline) REGULATORY DIVISION
Company's Service Quality and Its Response)
to Notice of Commission Action in) DOCKET NO. D2015.3.32
N2014.11.92)
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IN THE MATTER OF the Request of the) DOCKET NO. N2014.11.92
Montana Public Service Commission for)
Havre Pipeline Company Service Quality)
Information)

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL
TO HAVRE PIPELINE COMPANY**

MCC-001

Regarding: HPC's 2014 Farm Tap Investments
Witness: Unknown

At page 10 of HPC's Response, the Company states that in 2014 it invested more than \$200,000 to update most farm tap settings.

- a. Was any portion of that investment spent to update the farm tap settings of the four farm tap customers listed under A. MPSC Complaints, at pages 13 and 14 of HPC's Response? If so, please identify the customer and state how much HPC invested to update each customer's farm tap setting.
- b. If no portion of that investment was spent to update the farm tap settings of the four farm tap customers listed under A. MPSC Complaints, at pages 13 and 14 of HPC's Response, please explain why HPC chose not to make investments to update the farm tap setting of each such customer.

MCC-002

Regard: HPC's 2014 Farm Tap Investments
Witness: Unknown

At page 10 of HPC's Response, the Company states that in 2014 it invested more than \$200,000 to update most farm tap settings.

- a. Was any portion of that investment spent to update the farm tap settings of the twenty-eight farm tap customers listed under B. Farm Taps with Pressures Less Than 5 psig, at pages 14 – 17, of HPC’s Response? If so, please identify the customer(s) and state how much HPC invested to update each customer’s farm tap setting.
- b. If no portion of that investment was spent to update the farm tap setting of a farm tap customer listed under B. Farm Taps with Pressures Less Than 5 psig, at pages 14 – 17, of HPC’s Response, please explain why HPC chose not to make investments to update the farm tap setting of each such customer.

MCC-003

Regarding: Stuart Reynolds (FT 990024)
Witness: Unknown

Please state the average daily gas throughput in Mcf in each of the calendar years 2012 – 2014, of the gathering line used by HPC to provide service to Stuart Reynolds (FT 990024).

MCC-004

Regarding: Stuart Reynolds (FT 990024)
Witness: Unknown

- a. Please identify by name and FT number each other farm tap customer served by HPC in the area that does not experience the same problem as that described for Stuart Reynolds (FT 990024). See A.1.i at page 13 of HPC Response.
- b. Please explain why the other farm tap customers served by HPC in the area do not experience the same problem as that described for Stuart Reynolds.
- c. Has HPC installed methanol injection points along the gathering line serving Stuart Reynolds? If not, please explain why not.

MCC-005

Regarding: Source of Gas Supply
Witness: Unknown

HPC states at page 14 of its Response that the Curt Rambo (FT 990055) farm tap is located on the far end of a gathering line where several wells formerly produced gas, and there are no other producing gas wells in this area at the present time. HPC also states at page 14 of its Response that the Keith Donovan (FT 990058) farm tap is located on the same gathering line as the Curt Rambo farm tap, and three other farm tap customers (Donald Swinney, Lyle Williams, and Leon Williams) are served from this 14 mile segment of gathering line. Please explain how HPC provides gas service to these five farm tap customers, with an identification of the source(s) of gas supply used to serve them, if there are no producing gas wells in this area.

MCC-006

Regarding: Gathering Line Throughput Volumes
Witness: Unknown

Please state the average daily gas throughput in Mcf in each of calendar years 2012 -2014 for the following:

- a. The gathering line used by HPC to provide service to Curt Rambo (FT 990055).
- b. The gathering line used by HPC to provide service to Keith Donovan (FT 990058).
- c. The gathering line used by HPC to provide service to Donald Swinney.
- d. The gathering line used by HPC to provide service to Lyle Williams.
- e. The gathering line used by HPC to provide service to Leon Williams.
- f. The gathering line used by HPC to provide service to Lois Ramberg (FT 990012).
- g. The gathering line used by HPC to provide service to Stuart Reynolds (FT 990024).

MCC-007

Regarding: Footnote 3 at page 11 of HPC Response
Witness: Unknown

- a. Please provide a description of HPC's findings, including copies of any applicable documents prepared by or for HPC, relating to the review of the situation referred to in the referenced footnote.
- b. Has HPC determined whether or not there is or previously was an easement to the pipeline applicable to the subject property.
- c. Has HPC determined whether or not the owner of the subject property was previously a customer of HPC or Northern Natural, and if so state when service ceased and describe the circumstances that resulted in the termination of service.

MCC-008

Regarding: Service Since November 20, 2014
Witness: Unknown

At page 2 of HPC's November 20, 2014 Motion For Extension in Docket No. N2014.11.92, the Company states "Please be advised that Havre Pipeline will not abandon any facilities during the heating season. Additionally, it will promptly handle freeze-offs on its side of the meter and provide guidance to customers if freeze-offs occur on the customer's side of the meter so that customers will continue to receive service during the winter months."

- a. Please identify each instance, by customer name and FT number, in which HPC abandoned service to a farm tap customer since November 20, 2014, and include a description of the reason why HPC abandoned that service.
- b. Please identify each instance, since November 20, 2014, by customer name and FT number, in which HPC handled a freeze-off on its side of the meter in order to continue providing adequate service to a farm tap customer, and include a description of what was done by HPC and the cost incurred by HPC to do so.
- c. Please identify each instance, since November 2014, by customer name and FT number, in which HPC provided guidance to a farm tap customer having a freeze-off on the customer's side of the meter, and include a description of what was done by HPC and the cost incurred by HPC to do so.

MCC-009

Regarding: Abandonment Of Gas Service
Witness: Unknown

For each farm tap customer listed at pages 13 – 17 of HPC’s Response, state whether or not gas would continue to flow through the gathering line that was previously used to serve the customer if HPC abandons service to the customer.

MCC-010

Regarding: Obligation to Serve Customers
Witness: Unknown

Does HPC agree that public utility gas companies have an obligation to serve their customers? If HPC does not so agree, please fully explain why.

MCC-011

Regarding: Gas Service Agreements/Contracts
Witness: Unknown

Does HPC agree that it is common for public utility gas companies to enter into gas service agreements or gas supply contracts with their customers? If HPC does not so agree, please fully explain why.

MCC-012

Regarding: Farm Tap Investments
Witness: Unknown

Does HPC presently expect or plan to make investments to update farm tap settings at any time during the next ten years to any farm tap customer identified in pages 13 – 17 of HPC’s Response? If so, please identify each such farm tap customer by name and FT number, and state when HPC expects or plans to make such investments.

MCC-013

Regarding: Farm Tap Investments
Witness: Unknown

Does HPC presently expect or plan to make investments to update farm tap settings at any time during the next ten years to any farm tap customers other than those that are identified in pages 13 – 17 of HPC’s Response? If so, please describe HPC’s expected or planned future investments to update farm tap settings.

MCC-014

Regarding: Abandonment Of Gas Service
Witness: Unknown

Does HPC presently expect or plan to abandon gas delivery service at any time during the next ten years to any farm tap customer identified in pages 13 – 17 of HPC’s Response? If so, please identify each such farm tap customer by name and FT number, and state when HPC expects or plans to abandon service to the customer.

MCC-015

Regarding: Gas Service Agreements/Contracts
Witness: Unknown

Please provide copies of all amendments and/or replacement service agreements/contracts and pipeline easement agreements that are referenced in or associated with Attachments 1 – 4 of HPC’s Response.

MCC-016

Regarding: Gas Sales Invoices
Witness: Unknown

Please provide copies of each gas sales invoice for gas deliveries made during December 2014 through February 2015, for gas sold by HPC to each farm tap customer identified in pages 13 – 17 of HPC’s Response.