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AOBA (A) Attachments Non-Confidential

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PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 1

QUESTION NO. 1-28

- Q.** Re: Witness Sims' Direct Testimony, Exhibit WG (A), at page 11, lines 20-22, please:
- a. Provide the data, analyses and workpapers used to compute the Actual FY 2015 ROE (i.e., 10.5%) that is shown in Exhibit WG (A)-1;
 - b. Indicate whether dollar amounts retained by the Company through earnings sharing mechanisms are included in the computation of the reported FY 2015 ROE;
 - c. Provide the amount the Company retained for FY 2015 as part of each applicable earnings sharing mechanism in each of its retail service jurisdictions;
 - d. Identify the amounts and sources of any other below-the-line revenues the Company received for FY 2015 and for each amount identified indicate whether it was included or excluded from the computed 10.5% Utility ROE for FY 2015;
 - e. Indicate whether the Actual 2015 Utility ROE shown in Exhibit WG (A)-1 reflects results that have been adjusted to reflect normal weather conditions, and provide the Company's assessment of the extent to which the reported 10.5% Actual ROE for FY2015 is influenced by colder than normal weather.

WASHINGTON GAS'S RESPONSE

04/11/2016

- A.**
- a. Please refer to the Company's response to AOBA Data Request 1-13(a).
 - b. The Company share of all amounts retained through various earnings mechanisms are included in the derivation of the utility ROE

- c. Please refer to Attachment 1 for the amount the Company retained for FY 2015 as part of each applicable earnings sharing mechanism in each of its retail service jurisdictions.
- d. Please refer to Attachment 1 for the amounts and sources of any other below-the-line revenues and expenses the Company received for FY 2015 all of which were included in the 10.5% Utility ROE for FY 2015.
- e. The results reflect the effects of the Maryland Revenue Normalization Adjustment, the Virginia Weather Normalization Adjustment, which remove the effects of revenue variations due to weather. The effects of variations from normal weather conditions in the District of Columbia are also removed.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

Washington Gas Light Company
2015 Corporate Scorecard Net Income
(\$ in Thousands)

Washington Gas	
Other Utility Operations, net of tax	\$ 82,440
Interruptible Margins, net of sharing and tax	11,217
Asset Optimization, net of sharing and tax (GAAP)	16,594
Chalk Point, net of sharing and tax	664
Below the Line Amounts	
Other Income	
Other Merchandising Expenses	(195)
Non-Utility Operations	(1,454)
Interest & Dividend Income	(27)
Allowance-for Other Funds Used-Const	723
Misc No operating Income	1,096
Gain Disposition of Property	132
Total Other Income	<u>275</u>
Other Income Deductions	
Loss Disposition on Property	(520)
Misc Income Deductions-Donations	(919)
Penalties	(211)
Expend for Civic Political	(554)
Other Deductions	(83)
Total Other Income Deductions	<u>(2,288)</u>
Total Taxes-Other Income & Deduct	<u>(879)</u>
Net Other Income (Deductions), net of tax	<u>(2,893)</u>
Washington Gas Net Income (GAAP)	107,358
Hampshire Gas Net Income (GAAP)	1,318
Total Regulated Utility Net Income	<u>108,676</u>
Non GAAP Adjustments	
DC Weather Impact	(86)
Unrealized Gains and losses on Asset Optimization	10,026
Supplier Imbalance	1,333
Impairment Loss on Springfield Facilities	463
Tax Effect of Non GAAP Adjustments	(4,656)
Total Non GAAP Adjustments	<u>7,080</u>
2015 Corporate Scorecard Net Income	<u><u>\$ 115,756</u></u>

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 3

QUESTION NO. 3-2

- Q.** Re: Exhibit WG (M)-1, Schedule A, page 4 of 4, please provide for each month of the Company's last three fiscal years and the Company's current fiscal year to date the actual number of interruptible customers served and show the numbers of customers in each month that were classified as:
- a. Flexible Rate Service customers;
 - b. Special Contract Service customers;
 - c. Cogeneration Service customers;
 - d. Interruptible Delivery Service customers.

WASHINGTON GAS'S RESPONSE

04/11/2016

- A.** Please see the attached Excel spreadsheet, which separates interruptible customers by sales service, delivery service and special contract. There are no cogeneration customers.

**SPONSOR: James B. Wagner
Director-Rates and Regulatory Affairs**

Washington Gas
 District of Columbia
 Number of Interruptible Customers
 For the Period October 2012 to February 2015

<u>Line No.</u>	<u>Month-Year</u>	<u>Sales a/</u>	<u>Delivery</u>	<u>Special Contract Delivery</u>	<u>Line No.</u>
1	Oct-2012	6	159	-	1
2	Nov-2012	10	181	-	2
3	Dec-2012	8	186	-	3
4	Jan-2013	8	183	-	4
5	Feb-2013	9	184	-	5
6	Mar-2013	8	179	-	6
7	Apr-2013	8	178	-	7
8	May-2013	8	170	-	8
9	Jun-2013	18	166	-	9
10	Jul-2013	8	156	-	10
11	Aug-2013	6	152	-	11
12	Sep-2013	6	147	-	12
13	FY 2013	<u>103</u>	<u>2,041</u>	<u>-</u>	13
14	Oct-2013	5	155	-	14
15	Nov-2013	8	180	-	15
16	Dec-2013	7	179	-	16
17	Jan-2014	5	179	-	17
18	Feb-2014	17	170	-	18
19	Mar-2014	9	175	-	19
20	Apr-2014	7	175	-	20
21	May-2014	8	170	-	21
22	Jun-2014	5	153	-	22
23	Jul-2014	18	156	-	23
24	Aug-2014	7	151	-	24
25	Sep-2014	6	153	-	25
26	FY 2014	<u>102</u>	<u>1,996</u>	<u>-</u>	26
27	Oct-2014	7	153	-	27
28	Nov-2014	10	168	-	28
29	Dec-2014	10	159	-	29
30	Jan-2015	10	158	-	30
31	Feb-2015	12	151	2	31
32	Mar-2015	10	154	2	32
33	Apr-2015	10	155	2	33
34	May-2015	10	154	2	34
35	Jun-2015	9	140	2	35
36	Jul-2015	8	132	2	36
37	Aug-2015	7	133	2	37
38	Sep-2015	8	130	2	38
39	FY 2015	<u>111</u>	<u>1,787</u>	<u>16</u>	39
40	Oct-2015	9	132	2	40
41	Nov-2015	12	149	2	41
42	Dec-2015	10	153	2	42
43	Jan-2016	11	150	2	43
44	Feb-2016	10	163	2	44

a/ Includes sales to delivery customers who are between suppliers.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 3

QUESTION NO. 3-3

- Q.** Re: Exhibit WG (M)-1, Schedule A, page 4 of 4, please provide for each month of the Company's last three fiscal years and the Company's current fiscal year to date the terms of gas provided to interruptible customers showing separately:
- a. Interruptible Sales Service Volumes (Rate Schedule No. 3) subdivided by volumes for:
 - 1. Flexible Rate Service customers;
 - 2. Special Contract Service customers;
 - 3. Cogeneration Service customers;
 - b. Interruptible delivery service customers (Rate Schedule 3A), noting that if there are any Special Contract Customers who receive interruptible delivery service volumes, those volumes should be separately identified for each month.

WASHINGTON GAS'S RESPONSE

04/11/2016

- A.** Please see the attached Excel spreadsheet, which separates interruptible customers by sales service, delivery service and special contract. There are no cogeneration customers.

SPONSOR: James B. Wagner
Director-Rates and Regulatory Affairs

Washington Gas
 District of Columbia
 Number of Interruptible Therms
 For the Period October 2012 to February 2015

Line No.	Month-Year	Sales a/	Delivery	Special Contract Delivery	Line No.
1	Oct-2012	18,446	5,043,067	-	1
2	Nov-2012	73,613	6,415,259	-	2
3	Dec-2012	110,328	10,449,005	-	3
4	Jan-2013	120,921	10,875,297	-	4
5	Feb-2013	128,877	12,570,565	-	5
6	Mar-2013	139,400	12,206,251	-	6
7	Apr-2013	136,275	11,535,370	-	7
8	May-2013	47,358	6,492,934	-	8
9	Jun-2013	187,471	5,622,646	-	9
10	Jul-2013	108,984	4,921,736	-	10
11	Aug-2013	122,300	4,922,502	-	11
12	Sep-2013	136,690	4,845,942	-	12
13	FY 2013	<u>1,330,662</u>	<u>95,900,573</u>	-	13
14	Oct-2013	117,692	4,870,317	-	14
15	Nov-2013	62,072	5,922,317	-	15
16	Dec-2013	115,502	9,955,691	-	16
17	Jan-2014	125,558	11,849,290	-	17
18	Feb-2014	492,703	8,780,782	-	18
19	Mar-2014	187,293	15,001,760	-	19
20	Apr-2014	128,186	10,927,392	-	20
21	May-2014	100,898	7,322,594	-	21
22	Jun-2014	3,598	5,455,938	-	22
23	Jul-2014	86,828	4,621,189	-	23
24	Aug-2014	25,187	4,603,477	-	24
25	Sep-2014	27,311	4,495,140	-	25
26	FY 2014	<u>1,472,829</u>	<u>93,805,886</u>	-	26
27	Oct-2014	26,176	3,852,106	-	27
28	Nov-2014	53,426	4,651,240	-	28
29	Dec-2014	191,573	8,607,258	-	29
30	Jan-2015	245,281	10,616,288	-	30
31	Feb-2015	327,412	8,188,693	3,751,099	31
32	Mar-2015	247,744	6,284,656	2,799,678	32
33	Apr-2015	205,495	7,158,120	2,717,141	33
34	May-2015	128,698	3,616,434	1,451,333	34
35	Jun-2015	37,524	3,236,161	507,897	35
36	Jul-2015	36,811	3,165,585	544,180	36
37	Aug-2015	40,415	3,106,269	558,378	37
38	Sep-2015	18,862	3,184,419	572,422	38
39	FY 2015	<u>1,559,415</u>	<u>65,667,228</u>	<u>12,902,127</u>	39
40	Oct-2015	18,634	3,304,354	584,755	40
41	Nov-2015	125,177	5,070,954	33,937	41
42	Dec-2015	104,176	6,519,797	196,002	42
43	Jan-2016	144,441	7,376,197	326,176	43
44	Feb-2016	283,921	11,108,978	799,113	44

a/ Includes sales to delivery customers who are between suppliers.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-4

- Q.** Re: the Direct Testimony of witness Gibson at pages 1-2, please:
- a. Detail the witness's experience in the area of weather normalization analyses for natural gas distribution utilities;
 - b. Identify each utility other than Washington Gas for which the witness has:
 1. Prepared weather normalization analyses for sales and/or revenues and explain the witness's role and responsibilities in the performance of such analyses;
 2. Reviewed weather normalization analyses and explain the timing and scope of the review performed.
 3. Explain the interactions the witness had with WG witness Raab as part of the preparation of witness Gibson's direct testimony and exhibits for this proceeding and identify all inputs provided to witness Gibson by witness Raab;
 4. Detail and explain the extent to which witness Gibson was involved in the preparation and/or review of witness Raab's direct testimony and exhibits for this proceeding and identify all inputs provided to witness Raab by witness Gibson.

WASHINGTON GAS'S RESPONSE

04/21/2016

- A.** My experience in the area of weather normalization is limited to my work at Washington Gas Light Company.

Regarding Questions b.1 and b.2, the only utility I have worked for is Washington Gas Light Company.

I assume subparts b.3 and b.4 are intended to be general questions and not predicated on whether I worked for another utility. In that regard on Question b.3, Witness Raab provided no input to my testimony. On Question b.4, I was not involved in the preparation of Witness Raab's testimony; someone under my supervision or I provided the Class Cost Study and Normal Weather Study as inputs for his testimony once they were finalized in my area. The extent of my review was reading Witness Raab's testimony and verifying that the numbers sourced from the Normal Weather Study tied to my exhibit.

SPONSOR: Aaron B. Gibson
Manager, Regulatory Accounting

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-5

- Q.** Re: the Direct Testimony of witness Gibson at page 4, lines 6-10, please:
- a. Provide the specific language from Commission orders, authoritative texts, or other documents upon which the witness relies to assert that, "*In order to determine ratemaking revenues, it is necessary first to establish what constitutes normal weather.*" (Emphasis Added).
 - b. Document the witness's efforts to identify other gas distribution utilities' practices with respect to weather normalization of test year revenues and show the results of those efforts.

WASHINGTON GAS'S RESPONSE

04/21/2016

- A.**
- a. I relied on no Commission orders, authoritative texts, or other documents in making this assertion. It is simply true from the empirical evidence available to the Company that shows that volumetric revenues vary with weather, and weather itself is variable.
 - b. I have not attempted to identify the practices of other gas utilities with respect to weather normalization.

SPONSOR: Aaron B. Gibson
Manager, Regulatory Accounting

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE APARTMENT AND OFFICE BUILDING
ASSOCIATION OF METROPOLITAN WASHINGTON**

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-9

- Q.** Re: the Direct Testimony of witness Gibson at page 5, lines 8-11, please:
- a.** Provide the Company's actual monthly meter reading schedules for:
 - 1. Each of the Company's three fiscal years that immediately preceded the test year in this case; and
 - 2. The Company's current fiscal year;
 - b.** Identify and explain any and all deviations of actual meter reads from scheduled meter reads by class and sub-class of customers for each month of the Company's last five fiscal years;
 - c.** Fully document the manner in which the meter reading schedules for each class and sub-class of customers was considered in the conversion of calendar month Normal Weather HDDs to billing month HDDs;
 - d.** Identify the number of customers by rate classification that are billed on a calendar month basis (showing sales service and delivery service customers separately) and explain when meters are read each month for customers that are subject to calendar month billing.

WASHINGTON GAS'S PARTIAL OBJECTION

04/07/16

Washington Gas objects to subpart (b) of this request on the grounds that it requires the preparation of a special study that has not been performed by the Company.

WASHINGTON GAS'S RESPONSE

04/21/16

- A.** a. The meter reading schedules are prepared on a calendar year basis. As a result, the monthly meter reading schedules have been provided for calendar

years 2011 through 2015. Please refer to the attachment, "DR AOBA 5-9 Attachment 1 – Meter Reading Schedules.xlsx."

- c. The meter reading schedules are used in converting the calendar year Normal Weather HDDs to a billing basis as usage information is on a billing basis. This is further detailed in the direct testimony of Witness Gibson at Exhibit WG (E), lines 18 through 25 on page 6 and lines 1 through 4 on page 7. The electronic copy of Exhibit WG (E)-3 was also provided with the Company's application.
- d. All firm customers are billed based on the meter reading schedules. Interruptible customers are billed on the first day of the month for the prior month's usage, and their meters are read daily. As included in Exhibit WG (E)-1, the Normal Weather Study provides an approximate number of customers by rate class with the months billed totals.

AOBA FOLLOW-UP DATA REQUEST

04/08/16

5-9. Re: the Direct Testimony of witness Gibson at page 5, lines 8-11, please:

- b. Identify and explain any and all deviations of actual meter reads from scheduled meter reads by class and sub-class of customers for each month of the Company's test year.

WASHINGTON GAS'S FOLLOW-UP DATA RESPONSE

04/21/16

A. The Company does not track this information.

SPONSOR: Aaron B. Gibson
Manager, Regulatory Accounting

2011 Meter Reading Schedule

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
JANUARY				
	1	12/28/10	12/30/10	01/24/11
	2	12/29/10	01/03/11	01/24/11
	3	12/30/10	01/04/11	01/24/11
	4	01/03/11	01/05/11	01/25/11
	5	01/04/11	01/06/11	01/26/11
	6	01/05/11	01/07/11	01/31/11
	7	01/06/11	01/10/11	01/31/11
	8	01/07/11	01/11/11	01/31/11
	9	01/10/11	01/12/11	02/01/11
	10	01/11/11	01/13/11	02/02/11
	11	01/12/11	01/14/11	02/07/11
	12	01/13/11	01/18/11	02/07/11
	13	01/14/11	01/19/11	02/07/11
	14	01/18/11	01/20/11	02/09/11
	15	01/19/11	01/21/11	02/14/11
	16	01/20/11	01/24/11	02/14/11
	17	01/21/11	01/25/11	02/14/11
	18	01/24/11	01/26/11	02/15/11
	19	01/25/11	01/27/11	02/16/11
	20	01/26/11	01/28/11	02/22/11
21	01/27/11	01/31/11	02/22/11	

Holidays 12/31/10, 01/17/11

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
FEBRUARY				
	1	01/28/11	02/01/11	02/22/11
	2	01/31/11	02/02/11	02/22/11
	3	02/01/11	02/03/11	02/23/11
	4	02/02/11	02/04/11	02/28/11
	5	02/03/11	02/07/11	02/28/11
	6	02/04/11	02/08/11	02/28/11
	7	02/07/11	02/09/11	03/01/11
	8	02/08/11	02/10/11	03/02/11
	9	02/09/11	02/11/11	03/07/11
	10	02/10/11	02/12/11	03/07/11
	11	02/11/11	02/14/11	03/07/11
	12	02/12/11	02/15/11	03/07/11
	13	02/14/11	02/16/11	03/08/11
	14	02/15/11	02/17/11	03/09/11
	15	02/16/11	02/18/11	03/14/11
	16	02/17/11	02/22/11	03/14/11
	17	02/18/11	02/23/11	03/15/11
	18	02/22/11	02/24/11	03/16/11
	19	02/23/11	02/25/11	03/21/11
	20	02/24/11	02/26/11	03/21/11
21	02/25/11	02/28/11	03/21/11	

Holiday 2/21/11

Saturdays 02/12/11 and 02/26/11

2011 Meter Reading Schedule

Formal Case No. 1137
 AOBA DR No. 5-9
 Attachment 1
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Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
MARCH				
	1	02/26/11	03/01/11	03/21/11
	2	02/28/11	03/02/11	03/22/11
	3	03/01/11	03/03/11	03/23/11
	4	03/02/11	03/04/11	03/28/11
	5	03/03/11	03/07/11	03/28/11
	6	03/04/11	03/08/11	03/28/11
	7	03/07/11	03/09/11	03/29/11
	8	03/08/11	03/10/11	03/30/11
	9	03/09/11	03/11/11	04/04/11
	10	03/10/11	03/14/11	04/04/11
	11	03/11/11	03/15/11	04/04/11
	12	03/14/11	03/16/11	04/05/11
	13	03/15/11	03/17/11	04/06/11
	14	03/16/11	03/18/11	04/11/11
	15	03/17/11	03/21/11	04/11/11
	16	03/18/11	03/22/11	04/11/11
	17	03/21/11	03/23/11	04/12/11
	18	03/22/11	03/24/11	04/13/11
	19	03/23/11	03/25/11	04/18/11
	20	03/24/11	03/28/11	04/18/11
21	03/25/11	03/29/11	04/18/11	

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
APRIL				
	1	03/28/11	03/30/11	04/19/11
	2	03/29/11	03/31/11	04/20/11
	3	03/30/11	04/01/11	04/25/11
	4	03/31/11	04/04/11	04/25/11
	5	04/01/11	04/05/11	04/25/11
	6	04/04/11	04/06/11	04/26/11
	7	04/05/11	04/07/11	04/27/11
	8	04/06/11	04/08/11	05/02/11
	9	04/07/11	04/11/11	05/02/11
	10	04/08/11	04/12/11	05/02/11
	11	04/11/11	04/13/11	05/03/11
	12	04/12/11	04/14/11	05/04/11
	13	04/13/11	04/15/11	05/09/11
	14	04/14/11	04/18/11	05/09/11
	15	04/15/11	04/19/11	05/09/11
	16	04/18/11	04/20/11	05/10/11
	17	04/19/11	04/21/11	05/11/11
	18	04/20/11	04/22/11	05/16/11
	19	04/21/11	04/25/11	05/16/11
	20	04/22/11	04/26/11	05/16/11
21	04/25/11	04/27/11	05/17/11	

2011 Meter Reading Schedule

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
MAY				
	1	04/26/11	04/28/11	05/18/11
	2	04/27/11	04/29/11	05/23/11
	3	04/28/11	05/02/11	05/23/11
	4	04/29/11	05/03/11	05/23/11
	5	05/02/11	05/04/11	05/24/11
	6	05/03/11	05/05/11	05/25/11
	7	05/04/11	05/06/11	05/31/11
	8	05/05/11	05/09/11	05/31/11
	9	05/06/11	05/10/11	05/31/11
	10	05/09/11	05/11/11	05/31/11
	11	05/10/11	05/12/11	06/01/11
	12	05/11/11	05/13/11	06/06/11
	13	05/12/11	05/16/11	06/06/11
	14	05/13/11	05/17/11	06/06/11
	15	05/16/11	05/18/11	06/07/11
	16	05/17/11	05/19/11	06/08/11
	17	05/18/11	05/20/11	06/13/11
	18	05/19/11	05/23/11	06/13/11
	19	05/20/11	05/24/11	06/13/11
20	05/23/11	05/25/11	06/14/11	
21	05/24/11	05/26/11	06/15/11	

Holiday 5/30/11

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
JUNE				
	1	05/25/11	05/27/11	06/20/11
	2	05/26/11	05/31/11	06/20/11
	3	05/27/11	06/01/11	06/21/11
	4	05/31/11	06/02/11	06/22/11
	5	06/01/11	06/03/11	06/27/11
	6	06/02/11	06/06/11	06/27/11
	7	06/03/11	06/07/11	06/27/11
	8	06/06/11	06/08/11	06/28/11
	9	06/07/11	06/09/11	06/29/11
	10	06/08/11	06/10/11	07/05/11
	11	06/09/11	06/13/11	07/05/11
	12	06/10/11	06/14/11	07/05/11
	13	06/13/11	06/15/11	07/05/11
	14	06/14/11	06/16/11	07/06/11
	15	06/15/11	06/17/11	07/11/11
	16	06/16/11	06/20/11	07/11/11
	17	06/17/11	06/21/11	07/11/11
	18	06/20/11	06/22/11	07/12/11
	19	06/21/11	06/23/11	07/13/11
20	06/22/11	06/24/11	07/18/11	
21	06/23/11	06/27/11	07/18/11	

2011 Meter Reading Schedule

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Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
JULY				
	1	06/24/11	06/28/11	07/18/11
	2	06/27/11	06/29/11	07/19/11
	3	06/28/11	06/30/11	07/20/11
	4	06/29/11	07/01/11	07/25/11
	5	06/30/11	07/05/11	07/25/11
	6	07/01/11	07/06/11	07/26/11
	7	07/05/11	07/07/11	07/27/11
	8	07/06/11	07/08/11	08/01/11
	9	07/07/11	07/11/11	08/01/11
	10	07/08/11	07/12/11	08/01/11
	11	07/11/11	07/13/11	08/02/11
	12	07/12/11	07/14/11	08/03/11
	13	07/13/11	07/15/11	08/08/11
	14	07/14/11	07/18/11	08/08/11
	15	07/15/11	07/19/11	08/08/11
	16	07/18/11	07/20/11	08/09/11
	17	07/19/11	07/21/11	08/10/11
	18	07/20/11	07/22/11	08/15/11
	19	07/21/11	07/25/11	08/15/11
	20	07/22/11	07/26/11	08/15/11
21	07/25/11	07/27/11	08/16/11	

Holiday 7/4/11

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
AUGUST				
	1	07/26/11	07/28/11	08/17/11
	2	07/27/11	07/29/11	08/22/11
	3	07/28/11	08/01/11	08/22/11
	4	07/29/11	08/02/11	08/22/11
	5	08/01/11	08/03/11	08/23/11
	6	08/02/11	08/04/11	08/24/11
	7	08/03/11	08/05/11	08/29/11
	8	08/04/11	08/08/11	08/29/11
	9	08/05/11	08/09/11	08/29/11
	10	08/08/11	08/10/11	08/30/11
	11	08/09/11	08/11/11	08/31/11
	12	08/10/11	08/12/11	09/06/11
	13	08/11/11	08/15/11	09/06/11
	14	08/12/11	08/16/11	09/06/11
	15	08/15/11	08/17/11	09/06/11
	16	08/16/11	08/18/11	09/07/11
	17	08/17/11	08/19/11	09/12/11
	18	08/18/11	08/22/11	09/12/11
	19	08/19/11	08/23/11	09/12/11
	20	08/22/11	08/24/11	09/13/11
21	08/23/11	08/25/11	09/14/11	

2011 Meter Reading Schedule

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Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
SEPTEMBER				
	1	08/24/11	08/26/11	09/19/11
	2	08/25/11	08/29/11	09/19/11
	3	08/26/11	08/30/11	09/19/11
	4	08/29/11	08/31/11	09/20/11
	5	08/30/11	09/01/11	09/21/11
	6	08/31/11	09/02/11	09/26/11
	7	09/01/11	09/06/11	09/26/11
	8	09/02/11	09/07/11	09/27/11
	9	09/06/11	09/08/11	09/28/11
	10	09/07/11	09/09/11	10/03/11
	11	09/08/11	09/12/11	10/03/11
	12	09/09/11	09/13/11	10/03/11
	13	09/12/11	09/14/11	10/04/11
	14	09/13/11	09/15/11	10/05/11
	15	09/14/11	09/16/11	10/10/11
	16	09/15/11	09/19/11	10/10/11
	17	09/16/11	09/20/11	10/10/11
	18	09/19/11	09/21/11	10/11/11
	19	09/20/11	09/22/11	10/12/11
	20	09/21/11	09/23/11	10/17/11
21	09/22/11	09/26/11	10/17/11	

Holiday 9/5/11

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
OCTOBER				
	1	09/23/11	09/27/11	10/17/11
	2	09/26/11	09/28/11	10/18/11
	3	09/27/11	09/29/11	10/19/11
	4	09/28/11	09/30/11	10/24/11
	5	09/29/11	10/03/11	10/24/11
	6	09/30/11	10/04/11	10/24/11
	7	10/03/11	10/05/11	10/24/11
	8	10/04/11	10/06/11	10/26/11
	9	10/05/11	10/07/11	10/31/11
	10	10/06/11	10/10/11	10/31/11
	11	10/07/11	10/11/11	10/31/11
	12	10/10/11	10/12/11	11/01/11
	13	10/11/11	10/13/11	11/02/11
	14	10/12/11	10/14/11	11/07/11
	15	10/13/11	10/17/11	11/07/11
	16	10/14/11	10/18/11	11/07/11
	17	10/17/11	10/19/11	11/08/11
	18	10/18/11	10/20/11	11/09/11
	19	10/19/11	10/21/11	11/14/11
	20	10/20/11	10/24/11	11/14/11
21	10/21/11	10/25/11	11/14/11	

2011 Meter Reading Schedule

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
NOVEMBER				
	1	10/24/11	10/26/11	11/15/11
	2	10/25/11	10/27/11	11/16/11
	3	10/26/11	10/28/11	11/17/11
	4	10/27/11	10/31/11	11/21/11
	5	10/28/11	11/01/11	11/21/11
	6	10/31/11	11/02/11	11/22/11
	7	11/01/11	11/03/11	11/23/11
	8	11/02/11	11/04/11	11/28/11
	9	11/03/11	11/07/11	11/28/11
	10	11/04/11	11/08/11	11/28/11
	11	11/07/11	11/09/11	11/29/11
	12	11/08/11	11/10/11	11/30/11
	13	11/09/11	11/14/11	12/05/11
	14	11/10/11	11/15/11	12/05/11
	15	11/14/11	11/16/11	12/06/11
	16	11/15/11	11/17/11	12/07/11
	17	11/16/11	11/18/11	12/12/11
	18	11/17/11	11/21/11	12/12/11
	19	11/18/11	11/22/11	12/12/11
	20	11/21/11	11/23/11	12/19/11
21	11/22/11	11/28/11	12/19/11	

Holiday 11/11/11, 11/24/11, 11/25/11

Cycle Month	Cycle Day	Read Date	Bill Date	Due Date
DECEMBER				
	1	11/23/11	11/29/11	12/19/11
	2	11/28/11	11/30/11	12/20/11
	3	11/29/11	12/01/11	12/21/11
	4	11/30/11	12/02/11	12/27/11
	5	12/01/11	12/05/11	12/27/11
	6	12/02/11	12/06/11	12/27/11
	7	12/05/11	12/07/11	12/27/11
	8	12/06/11	12/08/11	12/28/11
	9	12/07/11	12/09/11	01/03/12
	10	12/08/11	12/12/11	01/03/12
	11	12/09/11	12/13/11	01/03/12
	12	12/12/11	12/14/11	01/03/12
	13	12/13/11	12/15/11	01/04/12
	14	12/14/11	12/16/11	01/09/12
	15	12/15/11	12/19/11	01/09/12
	16	12/16/11	12/20/11	01/09/12
	17	12/19/11	12/21/11	01/10/12
	18	12/20/11	12/22/11	01/11/12
	19	12/21/11	12/23/11	01/16/12
	20	12/22/11	12/27/11	01/16/12
21	12/23/11	12/28/11	01/17/12	

Holiday 12/26/11

2012 Meter Reading Schedule

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
JANUARY				

1	12/27/11	12/29/11	01/18/12
2	12/28/11	12/30/11	01/23/12
3	12/29/11	01/03/11	01/23/12
4	12/30/11	01/04/12	01/24/12
5	01/03/12	01/05/12	01/25/12
6	01/04/12	01/06/12	01/30/12
7	01/05/12	01/09/12	01/30/12
8	01/06/12	01/10/12	01/30/12
9	01/09/12	01/11/12	01/31/12
10	01/10/12	01/12/12	02/01/12
11	01/11/12	01/13/12	02/06/12
12	01/12/12	01/17/12	02/06/12
13	01/13/12	01/18/12	02/07/12
14	01/17/12	01/19/12	02/08/12
15	01/18/12	01/20/12	02/13/12
16	01/19/12	01/23/12	02/13/12
17	01/20/12	01/24/12	02/13/12
18	01/23/12	01/25/12	02/14/12
19	01/24/12	01/26/12	02/15/12
20	01/25/12	01/27/12	02/21/12
21	01/26/12	01/30/12	02/21/12

Holiday(s) 01/02/2012, 01/16/2012

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
FEBRUARY				

1	01/27/12	01/31/12	02/21/12
2	01/30/12	02/01/12	02/21/12
3	01/31/12	02/02/12	02/22/12
4	02/01/12	02/03/12	02/27/12
5	02/02/12	02/06/12	02/27/12
6	02/03/12	02/07/12	02/27/12
7	02/06/12	02/08/12	02/28/12
8	02/07/12	02/09/12	02/29/12
9	02/08/12	02/10/12	03/05/12
10	02/09/12	02/13/12	03/05/12
11	02/10/12	02/14/12	03/05/12
12	02/13/12	02/15/12	03/06/12
13	02/14/12	02/16/12	03/07/12
14	02/15/12	02/17/12	03/12/12
15	02/16/12	02/21/12	03/12/12
16	02/17/12	02/22/12	03/13/12
17	02/21/12	02/23/12	03/14/12
18	02/22/12	02/24/12	03/19/12
19	02/23/12	02/27/12	03/19/12
20	02/24/12	02/28/12	03/19/12
21	02/27/12	02/29/12	03/20/12

Holiday 02/20/2012

2012 Meter Reading Schedule

Cycle Month Cycle Day Read Date Billing Date Due Date
 2012
 MARCH

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012	1	02/28/12	03/01/12	03/21/12
	2	02/29/12	03/02/12	03/26/12
	3	03/01/12	03/05/12	03/26/12
	4	03/02/12	03/06/12	03/28/12
	5	03/05/12	03/07/12	03/27/12
	6	03/06/12	03/08/12	03/28/12
	7	03/07/12	03/09/12	04/02/12
	8	03/08/12	03/12/12	04/02/12
	9	03/09/12	03/13/12	04/02/12
	10	03/12/12	03/14/12	04/03/12
	11	03/13/12	03/15/12	04/04/12
	12	03/14/12	03/16/12	04/09/12
	13	03/15/12	03/19/12	04/09/12
	14	03/16/12	03/20/12	04/09/12
	15	03/19/12	03/21/12	04/10/12
	16	03/20/12	03/22/12	04/11/12
	17	03/21/12	03/23/12	04/16/12
	18	03/22/12	03/26/12	04/16/12
	19	03/23/12	03/27/12	04/16/12
	20	03/26/12	03/28/12	04/17/12
	21	03/27/12	03/29/12	04/18/12

Cycle Month Cycle Day Read Date Billing Date Due Date
 2012
 APRIL

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012	1	03/28/12	03/30/12	04/23/12
	2	03/29/12	04/02/12	04/23/12
	3	03/30/12	04/03/12	04/23/12
	4	04/02/12	04/04/12	04/24/12
	5	04/03/12	04/05/12	04/25/12
	6	04/04/12	04/06/12	04/26/12
	7	04/05/12	04/08/12	04/30/12
	8	04/06/12	04/10/12	04/30/12
	9	04/09/12	04/11/12	05/02/12
	10	04/10/12	04/12/12	05/03/12
	11	04/11/12	04/13/12	05/07/12
	12	04/12/12	04/16/12	05/07/12
	13	04/13/12	04/17/12	05/07/12
	14	04/16/12	04/18/12	05/08/12
	15	04/17/12	04/19/12	05/09/12
	16	04/18/12	04/20/12	05/14/12
	17	04/19/12	04/23/12	05/14/12
	18	04/20/12	04/24/12	05/14/12
	19	04/23/12	04/25/12	05/15/12
	20	04/24/12	04/26/12	05/16/12
	21	04/25/12	04/27/12	05/21/12

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Cycle Month Cycle Day Read Date Billing Date Due Date
 2012
 MAY

1	04/26/12	04/30/12	05/21/12
2	04/27/12	05/01/12	05/21/12
3	04/30/12	05/02/12	05/22/12
4	05/01/12	05/03/12	05/23/12
5	05/02/12	05/04/12	05/29/12
6	05/03/12	05/07/12	05/29/12
7	05/04/12	05/08/12	05/29/12
8	05/07/12	05/09/12	05/29/12
9	05/08/12	05/10/12	05/30/12
10	05/09/12	05/11/12	06/04/12
11	05/10/12	05/14/12	06/04/12
12	05/11/12	05/15/12	06/04/12
13	05/14/12	05/16/12	06/05/12
14	05/15/12	05/17/12	06/06/12
15	05/16/12	05/18/12	06/11/12
16	05/17/12	05/21/12	06/11/12
17	05/18/12	05/22/12	06/11/12
18	05/21/12	05/23/12	06/12/12
19	05/22/12	05/24/12	06/13/12
20	05/23/12	05/25/12	06/18/12
21	05/24/12	05/29/12	06/18/12

Holiday 05/28/2012

Cycle Month Cycle Day Read Date Billing Date Due Date
 2012
 JUNE

1	05/25/12	05/30/12	06/19/12
2	05/29/12	05/31/12	06/20/12
3	05/30/12	06/01/12	06/21/12
4	05/31/12	06/04/12	06/25/12
5	06/01/12	06/05/12	06/25/12
6	06/04/12	06/06/12	06/26/12
7	06/05/12	06/07/12	06/27/12
8	06/06/12	06/08/12	07/02/12
9	06/07/12	06/11/12	07/02/12
10	06/08/12	06/12/12	07/02/12
11	06/11/12	06/13/12	07/03/12
12	06/12/12	06/14/12	07/05/12
13	06/13/12	06/15/12	07/09/12
14	06/14/12	06/18/12	07/09/12
15	06/15/12	06/19/12	07/09/12
16	06/18/12	06/20/12	07/10/12
17	06/19/12	06/21/12	07/11/12
18	06/20/12	06/22/12	07/16/12
19	06/21/12	06/25/12	07/16/12
20	06/22/12	06/26/12	07/16/12
21	06/25/12	06/27/12	07/27/12

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
JULY				

1	06/26/12	06/28/12	07/18/12
2	06/27/12	06/29/12	07/23/12
3	06/28/12	07/02/12	07/23/12
4	06/29/12	07/03/12	07/24/12
5	07/02/12	07/05/12	07/25/12
6	07/03/12	07/06/12	07/30/12
7	07/05/12	07/09/12	07/30/12
8	07/06/12	07/10/12	07/30/12
9	07/09/12	07/11/12	07/31/12
10	07/10/12	07/12/12	08/01/12
11	07/11/12	07/13/12	08/06/12
12	07/12/12	07/16/12	08/06/12
13	07/13/12	07/17/12	08/06/12
14	07/16/12	07/18/12	08/07/12
15	07/17/12	07/19/12	08/08/12
16	07/18/12	07/20/12	08/13/12
17	07/19/12	07/23/12	08/13/12
18	07/20/12	07/24/12	08/13/12
19	07/23/12	07/25/12	08/14/12
20	07/24/12	07/26/12	08/15/12
21	07/25/12	07/27/12	08/20/12

Holiday 07/04/2012

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
AUGUST				

1	07/26/12	07/30/12	08/20/12
2	07/27/12	07/31/12	08/20/12
3	07/30/12	08/01/12	08/21/12
4	07/31/12	08/02/12	08/22/12
5	08/01/12	08/03/12	08/27/12
6	08/02/12	08/06/12	08/27/12
7	08/03/12	08/07/12	08/27/12
8	08/06/12	08/08/12	08/28/12
9	08/07/12	08/09/12	08/29/12
10	08/08/12	08/10/12	09/04/12
11	08/09/12	08/13/12	09/04/12
12	08/10/12	08/14/12	09/04/12
13	08/13/12	08/15/12	09/04/12
14	08/14/12	08/16/12	09/05/12
15	08/15/12	08/17/12	09/10/12
16	08/16/12	08/20/12	09/10/12
17	08/17/12	08/21/12	09/10/12
18	08/20/12	08/22/12	09/11/12
19	08/21/12	08/23/12	09/12/12
20	08/22/12	08/24/12	09/17/12
21	08/23/12	08/27/12	09/17/12

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
SEPTEMBER				

1	08/24/12	08/28/12	09/17/12
2	08/27/12	08/29/12	09/18/12
3	08/28/12	08/30/12	09/19/12
4	08/29/12	08/31/12	09/20/12
5	08/30/12	09/04/12	09/24/12
6	08/31/12	09/05/12	09/25/12
7	09/04/12	09/06/12	09/26/12
8	09/05/12	09/07/12	10/01/12
9	09/06/12	09/10/12	10/01/12
10	09/07/12	09/11/12	10/01/12
11	09/10/12	09/12/12	10/02/12
12	09/11/12	09/13/12	10/03/12
13	09/12/12	09/14/12	10/08/12
14	09/13/12	09/17/12	10/08/12
15	09/14/12	09/18/12	10/08/12
16	09/17/12	09/19/12	10/09/12
17	09/18/12	09/20/12	10/10/12
18	09/19/12	09/21/12	10/15/12
19	09/20/12	09/24/12	10/15/12
20	09/21/12	09/25/12	10/15/12
21	09/24/12	09/26/12	10/16/12

Holiday 09/03/2012

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2012				
OCTOBER				

1	09/25/12	09/27/12	10/17/12
2	09/26/12	09/28/12	10/22/12
3	09/27/12	10/01/12	10/22/12
4	09/28/12	10/02/12	10/22/12
5	10/01/12	10/03/12	10/23/12
6	10/02/12	10/04/12	10/24/12
7	10/03/12	10/05/12	10/29/12
8	10/04/12	10/08/12	10/29/12
9	10/05/12	10/09/12	10/29/12
10	10/08/12	10/10/12	10/30/12
11	10/09/12	10/11/12	10/31/12
12	10/10/12	10/12/12	11/05/12
13	10/11/12	10/15/12	11/05/12
14	10/12/12	10/16/12	11/05/12
15	10/15/12	10/17/12	11/06/12
16	10/16/12	10/18/12	11/07/12
17	10/17/12	10/19/12	11/13/12
18	10/18/12	10/22/12	11/13/12
19	10/19/12	10/23/12	11/13/12
20	10/22/12	10/24/12	11/13/12
21	10/23/12	10/25/12	11/14/12

2012 Meter Reading Schedule

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
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2012

NOVEMBER

1		10/24/12	10/26/12	11/19/12
2		10/25/12	10/29/12	11/19/12
3		10/26/12	10/30/12	11/19/12
4		10/29/12	10/31/12	11/20/12
5		10/30/12	11/01/12	11/21/12
6		10/31/12	11/02/12	11/26/12
7		11/01/12	11/05/12	11/26/12
8		11/02/12	11/06/12	11/26/12
9		11/05/12	11/07/12	11/27/12
10		11/06/12	11/08/12	11/28/12
11		11/07/12	11/09/12	12/03/12
12		11/08/12	11/13/12	12/03/12
13		11/09/12	11/14/12	12/04/12
14		11/13/12	11/15/12	12/05/12
15		11/14/12	11/16/12	12/10/12
16		11/15/12	11/19/12	12/10/12
17		11/16/12	11/20/12	12/10/12
18		11/19/12	11/21/12	12/17/12
19		11/20/12	11/26/12	12/17/12
20		11/21/12	11/27/12	12/17/12
21		11/26/12	11/28/12	12/18/12

Holiday(s) 11/12/2012, 11/22/2012, 11/23/2012

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
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2012

DECEMBER

1		11/27/12	11/29/12	12/19/12
2		11/28/12	11/30/12	12/24/12
3		11/29/12	12/03/12	12/24/12
4		11/30/12	12/04/12	12/24/12
5		12/03/12	12/05/12	12/26/12
6		12/04/12	12/06/12	12/26/12
7		12/05/12	12/07/12	12/31/12
8		12/06/12	12/10/12	12/31/12
9		12/07/12	12/11/12	12/31/12
10		12/10/12	12/12/12	01/02/13
11		12/11/12	12/13/12	01/02/13
12		12/12/12	12/14/12	01/07/13
13		12/13/12	12/17/12	01/07/13
14		12/14/12	12/18/12	01/07/13
15		12/17/12	12/19/12	01/08/13
16		12/18/12	12/20/12	01/09/13
17		12/19/12	12/21/12	01/14/13
18		12/20/12	12/24/12	01/14/13
19		12/21/12	12/26/12	01/15/13
20		12/24/12	12/27/12	01/16/13
21		12/26/12	12/28/12	01/22/13

Holiday 12/25/2012

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
JANUARY				
	1	12/27/12	12/31/12	01/22/13
	2	12/28/12	01/02/13	01/22/13
	3	12/31/12	01/03/13	01/23/13
	4	01/02/13	01/04/13	01/28/13
	5	01/03/13	01/07/13	01/28/13
	6	01/04/13	01/08/13	01/28/13
	7	01/07/13	01/09/13	01/29/13
	8	01/08/13	01/10/13	01/30/13
	9	01/09/13	01/11/13	02/04/13
	10	01/10/13	01/14/13	02/04/13
	11	01/11/13	01/15/13	02/04/13
	12	01/14/13	01/16/13	02/05/13
	13	01/15/13	01/17/13	02/06/13
	14	01/16/13	01/18/13	02/11/13
	15	01/17/13	01/22/13	02/11/13
	16	01/18/13	01/23/13	02/12/13
	17	01/22/13	01/24/13	02/13/13
	18	01/23/13	01/25/13	02/19/13
	19	01/24/13	01/28/13	02/19/13
	20	01/25/13	01/29/13	02/19/13
	21	01/28/13	01/30/13	02/19/13

Holiday(s) 01/01/2013, 01/21/2013

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
FEBRUARY				
	1	01/29/13	01/31/13	02/20/13
	2	01/30/13	02/01/13	02/25/13
	3	01/31/13	02/04/13	02/25/13
	4	02/01/13	02/05/13	02/25/13
	5	02/04/13	02/06/13	02/26/13
	6	02/05/13	02/07/13	02/27/13
	7	02/06/13	02/08/13	03/04/13
	8	02/07/13	02/09/13	03/04/13
	9	02/08/13	02/11/13	03/04/13
	10	02/09/13	02/12/13	03/04/13
	11	02/11/13	02/13/13	03/05/13
	12	02/12/13	02/14/13	03/06/13
	13	02/13/13	02/15/13	03/11/13
	14	02/14/13	02/19/13	03/11/13
	15	02/15/13	02/20/13	03/12/13
	16	02/19/13	02/21/13	03/13/13
	17	02/20/13	02/22/13	03/18/13
	18	02/21/13	02/25/13	03/18/13
	19	02/22/13	02/26/13	03/18/13
	20	02/25/13	02/27/13	03/19/13
	21	02/26/13	02/28/13	03/20/13

Holiday(s) 02/18/2013 Saturday Read 02/09/2013

LIST OF HOLIDAYS		
01/01/13	Tuesday	New Year's Day
01/21/13	Monday	MLK Birthday
02/18/13	Monday	Washington's Birthday
05/27/13	Monday	Memorial Day
07/04/13	Thursday	Independence Day
09/02/13	Monday	Labor Day
11/11/13	Monday	Veterans Day
11/28/13	Thursday	Thanksgiving
11/29/13	Friday	Day After Thanksgiving
12/25/13	Wednesday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
MARCH				
	1	02/27/13	03/01/13	03/25/13
	2	02/28/13	03/04/13	03/25/13
	3	03/01/13	03/05/13	03/25/13
	4	03/04/13	03/06/13	03/26/13
	5	03/05/13	03/07/13	03/27/13
	6	03/06/13	03/08/13	04/01/13
	7	03/07/13	03/11/13	04/01/13
	8	03/08/13	03/12/13	04/01/13
	9	03/11/13	03/13/13	04/02/13
	10	03/12/13	03/14/13	04/03/13
	11	03/13/13	03/15/13	04/08/13
	12	03/14/13	03/18/13	04/08/13
	13	03/15/13	03/19/13	04/08/13
	14	03/18/13	03/20/13	04/09/13
	15	03/19/13	03/21/13	04/10/13
	16	03/20/13	03/22/13	04/15/13
	17	03/21/13	03/25/13	04/15/13
	18	03/22/13	03/26/13	04/15/13
	19	03/25/13	03/27/13	04/16/13
	20	03/26/13	03/28/13	04/17/13
	21	03/27/13	03/29/13	04/22/13

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
APRIL				
	1	03/28/13	04/01/13	04/22/13
	2	03/29/13	04/02/13	04/22/13
	3	04/01/13	04/03/13	04/23/13
	4	04/02/13	04/04/13	04/24/13
	5	04/03/13	04/05/13	04/29/13
	6	04/04/13	04/08/13	04/29/13
	7	04/05/13	04/09/13	04/29/13
	8	04/08/13	04/10/13	04/30/13
	9	04/09/13	04/11/13	05/01/13
	10	04/10/13	04/12/13	05/06/13
	11	04/11/13	04/15/13	05/06/13
	12	04/12/13	04/16/13	05/06/13
	13	04/15/13	04/17/13	05/07/13
	14	04/16/13	04/18/13	05/08/13
	15	04/17/13	04/19/13	05/13/13
	16	04/18/13	04/22/13	05/13/13
	17	04/19/13	04/23/13	05/13/13
	18	04/22/13	04/24/13	05/14/13
	19	04/23/13	04/25/13	05/15/13
	20	04/24/13	04/26/13	05/20/13
	21	04/25/13	04/29/13	05/20/13

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
MAY				
	1	04/26/13	04/30/13	05/20/13
	2	04/29/13	05/01/13	05/21/13
	3	04/30/13	05/02/13	05/22/13
	4	05/01/13	05/03/13	05/28/13
	5	05/02/13	05/06/13	05/28/13
	6	05/03/13	05/07/13	05/28/13
	7	05/06/13	05/08/13	05/28/13
	8	05/07/13	05/09/13	05/29/13
	9	05/08/13	05/10/13	06/03/13
	10	05/09/13	05/13/13	06/03/13
	11	05/10/13	05/14/13	06/03/13
	12	05/13/13	05/15/13	06/04/13
	13	05/14/13	05/16/13	06/05/13
	14	05/15/13	05/17/13	06/10/13
	15	05/16/13	05/20/13	06/10/13
	16	05/17/13	05/21/13	06/10/13
	17	05/20/13	05/22/13	06/11/13
	18	05/21/13	05/23/13	06/12/13
	19	05/22/13	05/24/13	06/17/13
	20	05/23/13	05/28/13	06/17/13
	21	05/24/13	05/29/13	06/18/13
Holiday(s) 05/27/2013				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
JUNE				
	1	05/28/13	05/30/13	06/19/13
	2	05/29/13	05/31/13	06/24/13
	3	05/30/13	06/03/13	06/24/13
	4	05/31/13	06/04/13	06/24/13
	5	06/03/13	06/05/13	06/25/13
	6	06/04/13	06/06/13	06/26/13
	7	06/05/13	06/07/13	07/01/13
	8	06/06/13	06/10/13	07/01/13
	9	06/07/13	06/11/13	07/01/13
	10	06/10/13	06/12/13	07/02/13
	11	06/11/13	06/13/13	07/03/13
	12	06/12/13	06/14/13	07/08/13
	13	06/13/13	06/17/13	07/08/13
	14	06/14/13	06/18/13	07/08/13
	15	06/17/13	06/19/13	07/09/13
	16	06/18/13	06/20/13	07/10/13
	17	06/19/13	06/21/13	07/15/13
	18	06/20/13	06/24/13	07/15/13
	19	06/21/13	06/25/13	07/15/13
	20	06/24/13	06/26/13	07/16/13
	21	06/25/13	06/27/13	07/17/13

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
JULY				
	1	06/26/13	06/28/13	07/22/13
	2	06/27/13	07/01/13	07/22/13
	3	06/28/13	07/02/13	07/22/13
	4	07/01/13	07/03/13	07/23/13
	5	07/02/13	07/05/13	07/29/13
	6	07/03/13	07/08/13	07/29/13
	7	07/05/13	07/09/13	07/29/13
	8	07/08/13	07/10/13	07/30/13
	9	07/09/13	07/11/13	07/31/13
	10	07/10/13	07/12/13	08/05/13
	11	07/11/13	07/15/13	08/05/13
	12	07/12/13	07/16/13	08/05/13
	13	07/15/13	07/17/13	08/06/13
	14	07/16/13	07/18/13	08/07/13
	15	07/17/13	07/19/13	08/12/13
	16	07/18/13	07/22/13	08/12/13
	17	07/19/13	07/23/13	08/12/13
	18	07/22/13	07/24/13	08/13/13
	19	07/23/13	07/25/13	08/14/13
	20	07/24/13	07/26/13	08/19/13
	21	07/25/13	07/29/13	08/19/13
Holiday(s) 07/04/2013				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
AUGUST				
	1	07/26/13	07/30/13	08/19/13
	2	07/29/13	07/31/13	08/20/13
	3	07/30/13	08/01/13	08/21/13
	4	07/31/13	08/02/13	08/26/13
	5	08/01/13	08/05/13	08/26/13
	6	08/02/13	08/06/13	08/26/13
	7	08/05/13	08/07/13	08/27/13
	8	08/06/13	08/08/13	08/28/13
	9	08/07/13	08/09/13	09/03/13
	10	08/08/13	08/12/13	09/03/13
	11	08/09/13	08/13/13	09/03/13
	12	08/12/13	08/14/13	09/03/13
	13	08/13/13	08/15/13	09/04/13
	14	08/14/13	08/16/13	09/09/13
	15	08/15/13	08/19/13	09/09/13
	16	08/16/13	08/20/13	09/09/13
	17	08/19/13	08/21/13	09/10/13
	18	08/20/13	08/22/13	09/11/13
	19	08/21/13	08/23/13	09/16/13
	20	08/22/13	08/26/13	09/16/13
	21	08/23/13	08/27/13	09/16/13

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
SEPTEMBER				
	1	08/26/13	08/28/13	09/17/13
	2	08/27/13	08/29/13	09/18/13
	3	08/28/13	08/30/13	09/23/13
	4	08/29/13	09/03/13	09/23/13
	5	08/30/13	09/04/13	09/24/13
	6	09/03/13	09/05/13	09/25/13
	7	09/04/13	09/06/13	09/30/13
	8	09/05/13	09/09/13	09/30/13
	9	09/06/13	09/10/13	09/30/13
	10	09/09/13	09/11/13	10/01/13
	11	09/10/13	09/12/13	10/02/13
	12	09/11/13	09/13/13	10/07/13
	13	09/12/13	09/16/13	10/07/13
	14	09/13/13	09/17/13	10/07/13
	15	09/16/13	09/18/13	10/08/13
	16	09/17/13	09/19/13	10/09/13
	17	09/18/13	09/20/13	10/14/13
	18	09/19/13	09/23/13	10/14/13
	19	09/20/13	09/24/13	10/14/13
	20	09/23/13	09/25/13	10/15/13
	21	09/24/13	09/26/13	10/16/13
Holiday(s) 09/02/2013				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
OCTOBER				
	1	09/25/13	09/27/13	10/21/13
	2	09/26/13	09/30/13	10/21/13
	3	09/27/13	10/01/13	10/21/13
	4	09/30/13	10/02/13	10/22/13
	5	10/01/13	10/03/13	10/23/13
	6	10/02/13	10/04/13	10/28/13
	7	10/03/13	10/07/13	10/28/13
	8	10/04/13	10/08/13	10/28/13
	9	10/07/13	10/09/13	10/29/13
	10	10/08/13	10/10/13	10/30/13
	11	10/09/13	10/11/13	11/04/13
	12	10/10/13	10/14/13	11/04/13
	13	10/11/13	10/15/13	11/04/13
	14	10/14/13	10/16/13	11/05/13
	15	10/15/13	10/17/13	11/06/13
	16	10/16/13	10/18/13	11/12/13
	17	10/17/13	10/21/13	11/12/13
	18	10/18/13	10/22/13	11/12/13
	19	10/21/13	10/23/13	11/12/13
	20	10/22/13	10/24/13	11/13/13
	21	10/23/13	10/25/13	11/18/13

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
NOVEMBER				
	1	10/24/13	10/28/13	11/18/13
	2	10/25/13	10/29/13	11/18/13
	3	10/28/13	10/30/13	11/19/13
	4	10/29/13	10/31/13	11/20/13
	5	10/30/13	11/01/13	11/25/13
	6	10/31/13	11/04/13	11/25/13
	7	11/01/13	11/05/13	11/25/13
	8	11/04/13	11/06/13	11/26/13
	9	11/05/13	11/07/13	11/27/13
	10	11/06/13	11/08/13	12/02/13
	11	11/07/13	11/12/13	12/02/13
	12	11/08/13	11/13/13	12/03/13
	13	11/12/13	11/14/13	12/04/13
	14	11/13/13	11/15/13	12/09/13
	15	11/14/13	11/18/13	12/09/13
	16	11/15/13	11/19/13	12/09/13
	17	11/18/13	11/20/13	12/10/13
	18	11/19/13	11/21/13	12/11/13
	19	11/20/13	11/22/13	12/16/13
	20	11/21/13	11/25/13	12/16/13
	21	11/22/13	11/26/13	12/16/13
Holiday(s) 11/11/2013				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2013				
DECEMBER				
	1	11/25/13	11/27/13	12/23/13
	2	11/26/13	12/02/13	12/23/13
	3	11/27/13	12/03/13	12/23/13
	4	12/02/13	12/04/13	12/24/13
	5	12/03/13	12/05/13	12/26/13
	6	12/04/13	12/06/13	12/30/13
	7	12/05/13	12/09/13	12/30/13
	8	12/06/13	12/10/13	12/30/13
	9	12/09/13	12/11/13	12/31/13
	10	12/10/13	12/12/13	01/02/14
	11	12/11/13	12/13/13	01/06/14
	12	12/12/13	12/16/13	01/06/14
	13	12/13/13	12/17/13	01/06/14
	14	12/16/13	12/18/13	01/07/14
	15	12/17/13	12/19/13	01/08/14
	16	12/18/13	12/20/13	01/13/14
	17	12/19/13	12/23/13	01/13/14
	18	12/20/13	12/24/13	01/14/14
	19	12/23/13	12/26/13	01/15/14
	20	12/24/13	12/27/13	01/21/14
	21	12/26/13	12/30/13	01/21/14
Holiday(s) 11/28/2013, 11/29/2013, 12/25/2013				

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
JANUARY				
1		12/27/13	12/31/13	01/21/14
2		12/30/13	01/02/14	01/22/14
3		12/31/13	01/03/14	01/27/14
4		01/02/14	01/06/14	01/27/14
5		01/03/14	01/07/14	01/27/14
6		01/06/14	01/08/14	01/28/14
7		01/07/14	01/09/14	01/29/14
8		01/08/14	01/10/14	02/03/14
9		01/09/14	01/13/14	02/03/14
10		01/10/14	01/14/14	02/03/14
11		01/13/14	01/15/14	02/04/14
12		01/14/14	01/16/14	02/05/14
13		01/15/14	01/17/14	02/10/14
14		01/16/14	01/21/14	02/10/14
15		01/17/14	01/22/14	02/11/14
16		01/21/14	01/23/14	02/12/14
17		01/22/14	01/24/14	02/18/14
18		01/23/14	01/27/14	02/18/14
19		01/24/14	01/28/14	02/18/14
20		01/27/14	01/29/14	02/18/14
21		01/28/14	01/30/14	02/19/14

Holiday(s) 01/01/2014, 01/20/2014

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
FEBRUARY				
1		01/29/14	01/31/14	02/24/14
2		01/30/14	02/03/14	02/24/14
3		01/31/14	02/04/14	02/24/14
4		02/03/14	02/05/14	02/25/14
5		02/04/14	02/06/14	02/26/14
6		02/05/14	02/07/14	03/03/14
7		02/06/14	02/08/14	03/03/14
8		02/07/14	02/10/14	03/03/14
9		02/08/14	02/11/14	03/03/14
10		02/10/14	02/12/14	03/04/14
11		02/11/14	02/13/14	03/05/14
12		02/12/14	02/14/14	03/10/14
13		02/13/14	02/18/14	03/10/14
14		02/14/14	02/19/14	03/11/14
15		02/18/14	02/20/14	03/12/14
16		02/19/14	02/21/14	03/17/14
17		02/20/14	02/24/14	03/17/14
18		02/21/14	02/25/14	03/17/14
19		02/24/14	02/26/14	03/18/14
20		02/25/14	02/27/14	03/19/14
21		02/26/14	02/28/14	03/24/14

Holiday(s) 02/17/2014 Saturday Read 02/08/2014

LIST OF HOLIDAYS		
01/01/14	Wednesday	New Year's Day
01/20/14	Monday	MLK Birthday
02/17/14	Monday	Washington's Birthday
05/26/14	Monday	Memorial Day
07/04/14	Friday	Independence Day
09/01/14	Monday	Labor Day
11/11/14	Tuesday	Veterans Day
11/27/14	Thursday	Thanksgiving
11/28/14	Friday	Day After Thanksgiving
12/25/14	Thursday	Christmas Day

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
MARCH				
1		02/27/14	03/03/14	03/24/14
2		02/28/14	03/04/14	03/24/14
3		03/03/14	03/05/14	03/25/14
4		03/04/14	03/06/14	03/26/14
5		03/05/14	03/07/14	03/31/14
6		03/06/14	03/10/14	03/31/14
7		03/07/14	03/11/14	03/31/14
8		03/10/14	03/12/14	04/01/14
9		03/11/14	03/13/14	04/02/14
10		03/12/14	03/14/14	04/07/14
11		03/13/14	03/17/14	04/07/14
12		03/14/14	03/18/14	04/07/14
13		03/17/14	03/19/14	04/08/14
14		03/18/14	03/20/14	04/09/14
15		03/19/14	03/21/14	04/14/14
16		03/20/14	03/24/14	04/14/14
17		03/21/14	03/25/14	04/14/14
18		03/24/14	03/26/14	04/15/14
19		03/25/14	03/27/14	04/16/14
20		03/26/14	03/28/14	04/21/14
21		03/27/14	03/31/14	04/21/14

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
APRIL				
1		03/28/14	04/01/14	04/21/14
2		03/31/14	04/02/14	04/22/14
3		04/01/14	04/03/14	04/23/14
4		04/02/14	04/04/14	04/28/14
5		04/03/14	04/07/14	04/28/14
6		04/04/14	04/08/14	04/28/14
7		04/07/14	04/09/14	04/29/14
8		04/08/14	04/10/14	04/30/14
9		04/09/14	04/11/14	05/05/14
10		04/10/14	04/14/14	05/05/14
11		04/11/14	04/15/14	05/05/14
12		04/14/14	04/16/14	05/06/14
13		04/15/14	04/17/14	05/07/14
14		04/16/14	04/18/14	05/12/14
15		04/17/14	04/21/14	05/12/14
16		04/18/14	04/22/14	05/12/14
17		04/21/14	04/23/14	05/13/14
18		04/22/14	04/24/14	05/14/14
19		04/23/14	04/25/14	05/19/14
20		04/24/14	04/28/14	05/19/14
21		04/25/14	04/29/14	05/19/14

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
MAY				
	1	04/28/14	04/30/14	05/20/14
	2	04/29/14	05/01/14	05/21/14
	3	04/30/14	05/02/14	05/27/14
	4	05/01/14	05/05/14	05/27/14
	5	05/02/14	05/06/14	05/27/14
	6	05/05/14	05/07/14	05/27/14
	7	05/06/14	05/08/14	05/28/14
	8	05/07/14	05/09/14	06/02/14
	9	05/08/14	05/12/14	06/02/14
	10	05/09/14	05/13/14	06/02/14
	11	05/12/14	05/14/14	06/03/14
	12	05/13/14	05/15/14	06/04/14
	13	05/14/14	05/16/14	06/09/14
	14	05/15/14	05/19/14	06/09/14
	15	05/16/14	05/20/14	06/09/14
	16	05/19/14	05/21/14	06/10/14
	17	05/20/14	05/22/14	06/11/14
	18	05/21/14	05/23/14	06/16/14
	19	05/22/14	05/27/14	06/16/14
	20	05/23/14	05/28/14	06/17/14
	21	05/27/14	05/29/14	06/18/14
	Holiday(s) 05/26/2014			
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
JUNE				
	1	05/28/14	05/30/14	06/23/14
	2	05/29/14	06/02/14	06/23/14
	3	05/30/14	06/03/14	06/23/14
	4	06/02/14	06/04/14	06/24/14
	5	06/03/14	06/05/14	06/25/14
	6	06/04/14	06/06/14	06/30/14
	7	06/05/14	06/09/14	06/30/14
	8	06/06/14	06/10/14	06/30/14
	9	06/09/14	06/11/14	07/01/14
	10	06/10/14	06/12/14	07/02/14
	11	06/11/14	06/13/14	07/07/14
	12	06/12/14	06/16/14	07/07/14
	13	06/13/14	06/17/14	07/07/14
	14	06/16/14	06/18/14	07/08/14
	15	06/17/14	06/19/14	07/09/14
	16	06/18/14	06/20/14	07/14/14
	17	06/19/14	06/23/14	07/14/14
	18	06/20/14	06/24/14	07/14/14
	19	06/23/14	06/25/14	07/15/14
	20	06/24/14	06/26/14	07/16/14
	21	06/25/14	06/27/14	07/21/14

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
JULY				
	1	06/26/14	06/30/14	07/21/14
	2	06/27/14	07/01/14	07/21/14
	3	06/30/14	07/02/14	07/22/14
	4	07/01/14	07/03/14	07/28/14
	5	07/02/14	07/07/14	07/28/14
	6	07/03/14	07/08/14	07/28/14
	7	07/07/14	07/09/14	07/29/14
	8	07/08/14	07/10/14	07/30/14
	9	07/09/14	07/11/14	08/04/14
	10	07/10/14	07/14/14	08/04/14
	11	07/11/14	07/15/14	08/04/14
	12	07/14/14	07/16/14	08/05/14
	13	07/15/14	07/17/14	08/06/14
	14	07/16/14	07/18/14	08/11/14
	15	07/17/14	07/21/14	08/11/14
	16	07/18/14	07/22/14	08/11/14
	17	07/21/14	07/23/14	08/12/14
	18	07/22/14	07/24/14	08/13/14
	19	07/23/14	07/25/14	08/18/14
	20	07/24/14	07/28/14	08/18/14
	21	07/25/14	07/29/14	08/18/14
Holiday(s) 07/04/2014				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
AUGUST				
	1	07/28/14	07/30/14	08/19/14
	2	07/29/14	07/31/14	08/20/14
	3	07/30/14	08/01/14	08/25/14
	4	07/31/14	08/04/14	08/25/14
	5	08/01/14	08/05/14	08/25/14
	6	08/04/14	08/06/14	08/26/14
	7	08/05/14	08/07/14	08/27/14
	8	08/06/14	08/08/14	09/02/14
	9	08/07/14	08/11/14	09/02/14
	10	08/08/14	08/12/14	09/02/14
	11	08/11/14	08/13/14	09/02/14
	12	08/12/14	08/14/14	09/03/14
	13	08/13/14	08/15/14	09/08/14
	14	08/14/14	08/18/14	09/08/14
	15	08/15/14	08/19/14	09/08/14
	16	08/18/14	08/20/14	09/09/14
	17	08/19/14	08/21/14	09/10/14
	18	08/20/14	08/22/14	09/15/14
	19	08/21/14	08/25/14	09/15/14
	20	08/22/14	08/26/14	09/15/14
	21	08/25/14	08/27/14	09/16/14

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
SEPTEMBER				
	1	08/26/14	08/28/14	09/17/14
	2	08/27/14	08/29/14	09/22/14
	3	08/28/14	09/02/14	09/22/14
	4	08/29/14	09/03/14	09/23/14
	5	09/02/14	09/04/14	09/24/14
	6	09/03/14	09/05/14	09/29/14
	7	09/04/14	09/08/14	09/29/14
	8	09/05/14	09/09/14	09/29/14
	9	09/08/14	09/10/14	09/30/14
	10	09/09/14	09/11/14	10/01/14
	11	09/10/14	09/12/14	10/06/14
	12	09/11/14	09/15/14	10/06/14
	13	09/12/14	09/16/14	10/06/14
	14	09/15/14	09/17/14	10/07/14
	15	09/16/14	09/18/14	10/08/14
	16	09/17/14	09/19/14	10/13/14
	17	09/18/14	09/22/14	10/13/14
	18	09/19/14	09/23/14	10/13/14
	19	09/22/14	09/24/14	10/14/14
	20	09/23/14	09/25/14	10/15/14
	21	09/24/14	09/26/14	10/20/14
Holiday(s) 09/01/2014				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
OCTOBER				
	1	09/25/14	09/29/14	10/20/14
	2	09/26/14	09/30/14	10/20/14
	3	09/29/14	10/01/14	10/21/14
	4	09/30/14	10/02/14	10/22/14
	5	10/01/14	10/03/14	10/27/14
	6	10/02/14	10/06/14	10/27/14
	7	10/03/14	10/07/14	10/27/14
	8	10/06/14	10/08/14	10/28/14
	9	10/07/14	10/09/14	10/29/14
	10	10/08/14	10/10/14	11/03/14
	11	10/09/14	10/13/14	11/03/14
	12	10/10/14	10/14/14	11/03/14
	13	10/13/14	10/15/14	11/04/14
	14	10/14/14	10/16/14	11/05/14
	15	10/15/14	10/17/14	11/10/14
	16	10/16/14	10/20/14	11/10/14
	17	10/17/14	10/21/14	11/10/14
	18	10/20/14	10/22/14	11/12/14
	19	10/21/14	10/23/14	11/12/14
	20	10/22/14	10/24/14	11/17/14
	21	10/23/14	10/27/14	11/17/14

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Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
NOVEMBER				
	1	10/24/14	10/28/14	11/17/14
	2	10/27/14	10/29/14	11/18/14
	3	10/28/14	10/30/14	11/19/14
	4	10/29/14	10/31/14	11/24/14
	5	10/30/14	11/03/14	11/24/14
	6	10/31/14	11/04/14	11/24/14
	7	11/03/14	11/05/14	11/25/14
	8	11/04/14	11/06/14	11/26/14
	9	11/05/14	11/07/14	12/01/14
	10	11/06/14	11/10/14	12/01/14
	11	11/07/14	11/12/14	12/02/14
	12	11/10/14	11/13/14	12/03/14
	13	11/12/14	11/14/14	12/08/14
	14	11/13/14	11/17/14	12/08/14
	15	11/14/14	11/18/14	12/08/14
	16	11/17/14	11/19/14	12/09/14
	17	11/18/14	11/20/14	12/10/14
	18	11/19/14	11/21/14	12/15/14
	19	11/20/14	11/24/14	12/15/14
	20	11/21/14	11/25/14	12/15/14
	21	11/24/14	11/26/14	12/22/14
Holiday(s) 11/11/2014				
Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2014				
DECEMBER				
	1	11/25/14	12/01/14	12/22/14
	2	11/26/14	12/02/14	12/22/14
	3	12/01/14	12/03/14	12/23/14
	4	12/02/14	12/04/14	12/24/14
	5	12/03/14	12/05/14	12/29/14
	6	12/04/14	12/08/14	12/29/14
	7	12/05/14	12/09/14	12/29/14
	8	12/08/14	12/10/14	12/30/14
	9	12/09/14	12/11/14	12/31/14
	10	12/10/14	12/12/14	01/05/15
	11	12/11/14	12/15/14	01/05/15
	12	12/12/14	12/16/14	01/05/15
	13	12/15/14	12/17/14	01/06/15
	14	12/16/14	12/18/14	01/07/15
	15	12/17/14	12/19/14	01/12/15
	16	12/18/14	12/22/14	01/12/15
	17	12/19/14	12/23/14	01/12/15
	18	12/22/14	12/24/14	01/14/15
	19	12/23/14	12/26/14	01/20/15
	20	12/24/14	12/29/14	01/20/15
	21	12/26/14	12/30/14	01/20/15
Holiday(s) 11/27/2014, 11/28/2014, 12/25/2014				

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
MARCH				
1		02/27/15	03/03/15	03/23/15
2		03/02/15	03/04/15	03/24/15
3		03/03/15	03/05/15	03/25/15
4		03/04/15	03/06/15	03/30/15
5		03/05/15	03/09/15	03/30/15
6		03/06/15	03/10/15	03/30/15
7		03/09/15	03/11/15	03/31/14
8		03/10/15	03/12/15	04/01/15
9		03/11/15	03/13/15	04/06/15
10		03/12/15	03/16/15	04/06/15
11		03/13/15	03/17/15	04/06/15
12		03/16/15	03/18/15	04/07/15
13		03/17/15	03/19/15	04/08/15
14		03/18/15	03/20/15	04/13/15
15		03/19/15	03/23/15	04/13/15
16		03/20/15	03/24/15	04/13/15
17		03/23/15	03/25/15	04/14/15
18		03/24/15	03/26/15	04/15/15
19		03/25/15	03/27/15	04/20/15
20		03/26/15	03/30/15	04/20/15
21		03/27/15	03/31/15	04/20/15

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
APRIL				
1		03/30/15	04/01/15	04/21/15
2		03/31/15	04/02/15	04/22/15
3		04/01/15	04/03/15	04/27/15
4		04/02/15	04/06/15	04/27/15
5		04/03/15	04/07/15	04/27/15
6		04/06/15	04/08/15	04/28/15
7		04/07/15	04/09/15	04/29/15
8		04/08/15	04/10/15	05/04/15
9		04/09/15	04/13/15	05/04/15
10		04/10/15	04/14/15	05/04/15
11		04/13/15	04/15/15	05/05/15
12		04/14/15	04/16/15	05/06/15
13		04/15/15	04/17/15	05/11/15
14		04/16/15	04/20/15	05/11/15
15		04/17/15	04/21/15	05/11/15
16		04/20/15	04/22/15	05/12/15
17		04/21/15	04/23/15	05/13/15
18		04/22/15	04/24/15	05/18/15
19		04/23/15	04/27/15	05/18/15
20		04/24/15	04/28/15	05/18/15
21		04/27/15	04/29/15	05/19/15

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
MAY				
	1	04/28/15	04/30/15	05/20/15
	2	04/29/15	05/01/15	05/26/15
	3	04/30/15	05/04/15	05/26/15
	4	05/01/15	05/05/15	05/26/15
	5	05/04/15	05/06/15	05/26/15
	6	05/05/15	05/07/15	05/27/15
	7	05/06/15	05/08/15	06/01/15
	8	05/07/15	05/11/15	06/01/15
	9	05/08/15	05/12/15	06/01/15
	10	05/11/15	05/13/15	06/02/15
	11	05/12/15	05/14/15	06/03/15
	12	05/13/15	05/15/15	06/08/15
	13	05/14/15	05/18/15	06/08/15
	14	05/15/15	05/19/15	06/08/15
	15	05/18/15	05/20/15	06/09/15
	16	05/19/15	05/21/15	06/10/15
	17	05/20/15	05/22/15	06/15/15
	18	05/21/15	05/26/15	06/15/15
	19	05/22/15	05/27/15	06/16/15
	20	05/26/15	05/28/15	06/17/15
	21	05/27/15	05/29/15	06/22/15
Holiday(s) 05/25/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
JUNE				
	1	05/28/15	06/01/15	06/22/15
	2	05/29/15	06/02/15	06/22/15
	3	06/01/15	06/03/15	06/23/15
	4	06/02/15	06/04/15	06/24/15
	5	06/03/15	06/05/15	06/29/15
	6	06/04/15	06/08/15	06/29/15
	7	06/05/15	06/09/15	06/29/15
	8	06/08/15	06/10/15	06/30/15
	9	06/09/15	06/11/15	07/01/15
	10	06/10/15	06/12/15	07/06/15
	11	06/11/15	06/15/15	07/06/15
	12	06/12/15	06/16/15	07/06/15
	13	06/15/15	06/17/15	07/07/15
	14	06/16/15	06/18/15	07/08/15
	15	06/17/15	06/19/15	07/13/15
	16	06/18/15	06/22/15	07/13/15
	17	06/19/15	06/23/15	07/13/15
	18	06/22/15	06/24/15	07/14/15
	19	06/23/15	06/25/15	07/15/15
	20	06/24/15	06/26/15	07/20/15
	21	06/25/15	06/29/15	07/20/15

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
JULY				
1		06/26/15	06/30/15	07/20/15
2		06/29/15	07/01/15	07/21/15
3		06/30/15	07/02/15	07/27/15
4		07/01/15	07/06/15	07/27/15
5		07/02/15	07/07/15	07/27/15
6		07/06/15	07/08/15	07/28/15
7		07/07/15	07/09/15	07/29/15
8		07/08/15	07/10/15	08/03/15
9		07/09/15	07/13/15	08/03/15
10		07/10/15	07/14/15	08/03/15
11		07/13/15	07/15/15	08/04/15
12		07/14/15	07/16/15	08/05/15
13		07/15/15	07/17/15	08/10/15
14		07/16/15	07/20/15	08/10/15
15		07/17/15	07/21/15	08/10/15
16		07/20/15	07/22/15	08/11/15
17		07/21/15	07/23/15	08/12/15
18		07/22/15	07/24/15	08/17/15
19		07/23/15	07/27/15	08/17/15
20		07/24/15	07/28/15	08/17/15
21		07/27/15	07/29/15	08/18/15
Holiday(s) 07/03/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
AUGUST				
1		07/28/15	07/30/15	08/19/15
2		07/29/15	07/31/15	08/24/15
3		07/30/15	08/03/15	08/24/15
4		07/31/15	08/04/15	08/24/15
5		08/03/15	08/05/15	08/25/15
6		08/04/15	08/06/15	08/26/15
7		08/05/15	08/07/15	08/31/15
8		08/06/15	08/10/15	08/31/15
9		08/07/15	08/11/15	08/31/15
10		08/10/15	08/12/15	09/01/15
11		08/11/15	08/13/15	09/02/15
12		08/12/15	08/14/15	09/08/15
13		08/13/15	08/17/15	09/08/15
14		08/14/15	08/18/15	09/08/15
15		08/17/15	08/19/15	09/08/15
16		08/18/15	08/20/15	09/09/15
17		08/19/15	08/21/15	09/14/15
18		08/20/15	08/24/15	09/14/15
19		08/21/15	08/25/15	09/14/15
20		08/24/15	08/26/15	09/15/14
21		08/25/15	08/27/15	09/16/15

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
JANUARY				
1		12/29/14	12/31/14	01/21/15
2		12/30/14	01/02/15	01/26/15
3		12/31/14	01/05/15	01/26/15
4		01/02/15	01/06/15	01/26/15
5		01/05/15	01/07/15	01/27/15
6		01/06/15	01/08/15	01/28/15
7		01/07/15	01/09/15	02/02/15
8		01/08/15	01/12/15	02/02/15
9		01/09/15	01/13/15	02/02/15
10		01/12/15	01/14/15	02/03/15
11		01/13/15	01/15/15	02/04/15
12		01/14/15	01/16/15	02/09/15
13		01/15/15	01/20/15	02/09/15
14		01/16/15	01/21/15	02/10/15
15		01/20/15	01/22/15	02/11/15
16		01/21/15	01/23/15	02/17/15
17		01/22/15	01/26/15	02/17/15
18		01/23/15	01/27/15	02/17/15
19		01/26/15	01/28/15	02/17/15
20		01/27/15	01/29/15	02/18/15
21		01/28/15	01/30/15	02/23/15
Holiday(s) 01/01/2015, 01/19/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
FEBRUARY				
1		01/29/15	02/02/15	02/23/15
2		01/30/15	02/03/15	02/23/15
3		02/02/15	02/04/15	02/24/15
4		02/03/15	02/05/15	02/25/15
5		02/04/15	02/06/15	03/02/15
6		02/05/15	02/07/15	03/02/15
7		02/06/15	02/09/15	03/02/15
8		02/07/15	02/10/15	03/02/15
9		02/09/15	02/11/15	03/03/15
10		02/10/15	02/12/15	03/04/15
11		02/11/15	02/13/15	03/09/15
12		02/12/15	02/17/15	03/09/15
13		02/13/15	02/18/15	03/10/15
14		02/17/15	02/19/15	03/11/15
15		02/18/15	02/20/15	03/16/15
16		02/19/15	02/23/15	03/16/15
17		02/20/15	02/24/15	03/16/15
18		02/23/15	02/25/15	03/17/15
19		02/24/15	02/26/15	03/18/15
20		02/25/15	02/27/15	03/23/15
21		02/26/15	3/2/2015*	03/23/15
Holiday(s)		02/16/2015 Saturday Read 02/07/2015		

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
SEPTEMBER				
	1	08/26/15	08/28/15	09/21/14
	2	08/27/15	08/31/15	09/21/14
	3	08/28/15	09/01/15	09/21/14
	4	08/31/15	09/02/15	09/22/15
	5	09/01/15	09/03/15	09/23/15
	6	09/02/15	09/04/15	09/28/15
	7	09/03/15	09/08/15	09/28/15
	8	09/04/15	09/09/15	09/29/15
	9	09/08/15	09/10/15	09/30/15
	10	09/09/15	09/11/15	10/05/15
	11	09/10/15	09/14/15	10/05/15
	12	09/11/15	09/15/15	10/05/15
	13	09/14/15	09/16/15	10/06/15
	14	09/15/15	09/17/15	10/07/15
	15	09/16/15	09/18/15	10/12/15
	16	09/17/15	09/21/15	10/12/15
	17	09/18/15	09/22/15	10/12/15
	18	09/21/15	09/23/15	10/13/15
	19	09/22/15	09/24/15	10/14/15
	20	09/23/15	09/25/15	10/19/15
	21	09/24/15	09/28/15	10/19/15
Holiday(s) 09/07/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
OCTOBER				
	1	09/25/15	09/29/15	10/19/15
	2	09/28/15	09/30/15	10/20/15
	3	09/29/15	10/01/15	10/21/15
	4	09/30/15	10/02/15	10/26/15
	5	10/01/15	10/05/15	10/26/15
	6	10/02/15	10/06/15	10/26/15
	7	10/05/15	10/07/15	10/27/15
	8	10/06/15	10/08/15	10/28/15
	9	10/07/15	10/09/15	11/02/15
	10	10/08/15	10/12/15	11/02/15
	11	10/09/15	10/13/15	11/02/15
	12	10/12/15	10/14/15	11/03/15
	13	10/13/15	10/15/15	11/04/15
	14	10/14/15	10/16/15	11/09/15
	15	10/15/15	10/19/15	11/09/15
	16	10/16/15	10/20/15	11/09/15
	17	10/19/15	10/21/15	11/10/15
	18	10/20/15	10/22/15	11/12/15
	19	10/21/15	10/23/15	11/16/15
	20	10/22/15	10/26/15	11/16/15
	21	10/23/15	10/27/15	11/16/15

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
NOVEMBER				
1		10/26/15	10/28/15	11/17/15
2		10/27/15	10/29/15	11/18/15
3		10/28/15	10/30/15	11/23/15
4		10/29/15	11/02/15	11/23/15
5		10/30/15	11/03/15	11/23/15
6		11/02/15	11/04/15	11/24/15
7		11/03/15	11/05/15	11/25/15
8		11/04/15	11/06/15	11/30/15
9		11/05/15	11/09/15	11/30/15
10		11/06/15	11/10/15	12/01/15
11		11/09/15	11/12/15	12/02/15
12		11/10/15	11/13/15	12/07/15
13		11/12/15	11/16/15	12/07/15
14		11/13/15	11/17/15	12/07/15
15		11/16/15	11/18/15	12/08/15
16		11/17/15	11/19/15	12/09/15
17		11/18/15	11/20/15	12/14/15
18		11/19/15	11/23/15	12/14/15
19		11/20/15	11/24/15	12/14/15
20		11/23/15	11/25/15	12/21/15
21		11/24/15	11/30/15	12/21/15
Holiday(s) 11/11/2015, 11/26/2015, 11/27/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

Cycle Month	Cycle Day	Read Date	Billing Date	Due Date
2015				
DECEMBER				
1		11/25/15	12/01/15	12/21/15
2		11/30/15	12/02/15	12/22/15
3		12/01/15	12/03/15	12/23/15
4		12/02/15	12/04/15	12/28/15
5		12/03/15	12/07/15	12/28/15
6		12/04/15	12/08/15	12/28/15
7		12/07/15	12/09/15	12/29/15
8		12/08/15	12/10/15	12/30/15
9		12/09/15	12/11/15	01/04/16
10		12/10/15	12/14/15	01/04/16
11		12/11/15	12/15/15	01/04/16
12		12/14/15	12/16/15	01/05/16
13		12/15/15	12/17/15	01/06/16
14		12/16/15	12/18/15	01/11/16
15		12/17/15	12/21/15	01/11/16
16		12/18/15	12/22/15	01/11/16
17		12/21/15	12/23/15	01/12/16
18		12/22/15	12/24/15	01/19/16
19		12/23/15	12/28/15	01/19/16
20		12/24/15	12/29/15	01/19/16
21		12/28/15	12/30/15	01/19/16
Holiday(s) 12/25/2015				

LIST OF HOLIDAYS		
01/01/15	Thursday	New Year's Day
01/19/15	Monday	MLK Birthday
02/16/15	Monday	Washington's Birthday
05/25/15	Monday	Memorial Day
07/03/15	Friday	Independence Day
09/07/15	Monday	Labor Day
11/11/14	Wednesday	Veterans Day
11/26/15	Thursday	Thanksgiving
11/27/15	Friday	Day After Thanksgiving
12/25/15	Friday	Christmas Day

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-10

- Q.** Re: the Direct Testimony of witness Gibson at page 5, lines 16-17, please:
- a. Provide a definition of the phrase "*base use*" as it is used in the referenced lines;
 - b. Verify that it is a common practice within the industry to identify "*base use*" requirements and subtract such base use requirement from actual gas use by rate classification prior to performing linear regression analysis to assess variations per HDD;
 - c. Cite all gas utilities known to the witness that use the approach for assessing "*base use*" that Washington Gas uses in this case.

WASHINGTON GAS'S RESPONSE

04/21/2016

- A.**
- a. The phrase "base use" is referencing the base gas factor as calculated within Schedule 4 of the Normal Weather Study at Exhibit WG (E)-1, pages 25 through 52. This factor is used to calculate the base gas therms by multiplying the factor by months billed. The base gas factor, as described in Witness Gibson's testimony page 8, lines 23-25, is the point where the regression line intercepts the y-axis, or usage when HDDs are zero.
 - b. The Company has not conducted a study of what is common place in the industry. To clarify though, the Company does not subtract base use from actual gas use at any time in the calculations of the normal weather study. Also, as the base use factor is calculated by the regression, it would be impossible to subtract this from something prior to calculating it.
 - c. I have not performed an analysis of other gas utilities' approaches.

SPONSOR: Aaron B. Gibson
Manager, Regulatory Accounting

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE OFFICE OF PEOPLE'S COUNSEL**

AOBA DATA REQUEST NO. 5

QUESTION NO. 5-23

- Q.** Re: the Direct Testimony of witness Gibson at page 12, lines 17-19, please:
- a. Document and explain witness Gibson's role in the preparation of the Company's "Revenue Study" for this proceeding;
 - b. Verify that witness Gibson's development of the therms used in the Company's "Revenue Study" to compute Peak Usage Charge revenue for non-residential rate classifications has been adjusted from test year actual billing data to reflect normal weather HDDs for the peak use month for each rate classification for which Peak Usage Charges are billed.

WASHINGTON GAS'S RESPONSE

04/21/2016

- A.**
- a. I oversee and review the work of the Regulatory Accounting group, which prepares the Revenue Study.
 - b. Yes, the Revenue Study uses the peak month usage from the Normal Weather Study in determining the Peak Usage Charge. Usage in the Normal Weather Study is based on normal weather HDDs.

**SPONSOR: Aaron B. Gibson
Manager, Regulatory Accounting**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 7

QUESTION NO. 7-1

Page 1 of 2

- Q. Re: the Direct Testimony of witness Huey at page 2, lines 13-20, please provide:
- a. A detailed description of each of the "certain select activities that accelerate or enhance pipeline safety" for which costs would be included in the proposed regulatory asset;
 - b. A detailed identification and description of system maintenance activities that would not be eligible to be included in the proposed regulatory asset;
 - c. The Company's rationale for why it is appropriate to request regulatory asset treatment for future pipeline safety initiatives that are currently unknown or not specifically identifiable.

WASHINGTON GAS'S RESPONSE

04/29/2016

- a. There are three activities **being considered** with the proposed development and implementation of the Damage Prevention Program Enforcement Improvement Plan. They are to improve damage prevention outreach; to improve locator and excavator damage prevention awareness and performance on difficult to locate facilities; and to implement a mapping verification project. **None of these activities have been estimated or budgeted.**

Other activities are to develop a Pipeline Safety Management System as prescribed by the American Petroleum Institute Recommended Practice 1173 (FY2016 \$150,000 budgeted and \$150,000 annually thereafter); to develop a Tracking and Traceability Program to increase the overall knowledge of the distribution system pipe and fitting assets which will help manage system risk and prepare for future federal reporting needs (FY2016 \$368,000 budgeted, FY2017 \$368,000 budgeted, and on-going annual cost thereafter that cannot be estimated at this time); to develop a Transmission Integrity Risk Model (FY2016 \$333,000 budgeted, FY2017 \$457,000 budgeted).

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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AOBA DATA REQUEST NO. 7

QUESTION NO. 7-1

Page 2 of 2

Budget data provided is for the entire system prior to allocation to the District of Columbia.

- b. The system maintenance activities that are included in base rates would not be included in a proposed regulatory asset.**
- c. The premise is to be able to perform enhanced pipeline safety related activities above and beyond what is required by current regulations and that are currently not reflected in base rates.**

**SPONSOR: Melton A. Huey
Director – Pipeline Integrity and Compliance**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 7

QUESTION NO. 7-3

Page 1 of 2

- Q. Re: the Direct Testimony of witness Huey at page 3, lines 11-14, and footnote 1, please provide all workpapers, studies, analyses, and documents used to:**
- a. Identify any new programs and/or incremental activities that will be required to comply with Title 49 of the Code of Federal Regulations and the estimated costs for each new program and each incremental activity that the Company believes will be required for compliance with the referenced regulation;**
 - b. Identify any new programs and/or incremental activities that will be required to comply with Part 191, of Title 49 of the Code of Federal Regulations and the estimated costs for each new program and each incremental activity that the Company believes will be required for compliance with the referenced regulation;**
 - c. Identify any new programs and/or incremental activities that will be required to comply with Part 192, of Title 49 of the Code of Federal Regulations and the estimated costs for each new program and each incremental activity that the Company believes will be required for compliance with the referenced regulation;**
 - d. Identify any new programs and/or incremental activities that will be required to comply with Part 193, of Title 49 of the Code of Federal Regulations and the estimated costs for each new program and each incremental activity that the Company believes will be required for compliance with the referenced regulation;**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 7

QUESTION NO. 7-3

Page 2 of 2

- e. Identify any new programs and/or incremental activities that will be required to comply with Part 100, of Title 49 of the Code of Federal Regulations and the estimated costs for each new program and each incremental activity that the Company believes will be required for compliance with the referenced regulation.

WASHINGTON GAS'S RESPONSE

04/29/2016

A.

- a. Until any new regulations are promulgated, the Company cannot predict either the scope or future costs.
- b. See response to 7-3a.
- c. See response to 7-3a.
- d. The Company does not operate any liquefied natural gas facilities under Part 193 of Title 49 of the Code of Federal Regulations.
- e. The Company does not operate any facilities under Part 100 of Title 49 of the Code of Federal Regulations.

**SPONSOR: Melton A. Huey
Director – Pipeline Integrity and Compliance**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 9

QUESTION NO. 9-8

- Q.** Re: the Direct Testimony of witness Hevert at page 21, lines 6 through 8, please provide:
- a. The average closing stock price for each proxy group company for each 30-trading day period that the witness examined other than the 30-trading day period ended December 31, 2015.
 - b. The average closing stock price for each proxy group company for each 90-trading day period that the witness examined other than the 90-trading day period ended December 31, 2015.
 - c. The average closing stock price for each proxy group company for each 180-day period that the witness examined other than the 180-trading day period ended December 31, 2015.
 - d. The witness' assessment of the differences between the 52 week average closing stock price and the average stock prices for 30-trading day, 90-trading day, 180-day trading periods for each company in his proxy group;
 - e. The calendar periods covered by the witness':
 - i. 30-trading day stock price average for each proxy group company
 - ii. 90-trading day stock price average for each proxy group company
 - iii. 180-trading day stock price average for each proxy group company

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.** a. Mr. Hevert did not examine any other 30-trading day period besides the 30-trading day period ending December 31, 2015.

- b. Mr. Hevert did not examine any other 90-trading day period besides the 90-trading day period ending December 31, 2015.
- c. Mr. Hevert did not examine any other 180-trading day period besides the 180-trading day period ending December 31, 2015.
- d. Mr. Hevert did not evaluate the 52 week average closing stock price, so he can not speculate to the differences between that and the 30-, 90-, and 180-trading day periods in his analysis.
- e.
 - i. 11/18/2015 – 12/31/2015
 - ii. 8/25/2015 – 12/31/2015
 - iii. 4/17/2015 – 12/31/2015

SPONSOR: Robert B. Hevert
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 9

QUESTION NO. 9-11

- Q.** Re: the Direct Testimony of witness Hevert from page 27, lines 10 through 16, please:
- a. Clarify what constitutes the "end of the period" in the context of a "terminal price" that is defined "by the present value of the remaining 'cash flows' in **perpetuity.**" (emphasis added)
 - b. Explain why in a practical context the estimates and assumptions underlying the witness' Multi-Stage Model" necessarily represent an improvement over the assumption and estimates relied upon in the Constant Growth DCF model.

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.**
- a. There technically is not a terminal price in the constant-growth DCF model. The cash flows received are the dividends in perpetuity. However, if all of the assumptions underlying the model hold, the same result is reached whether the dividends are projected in perpetuity, or whether they are projected for a shorter period, with the terminal price estimated by the Gordon Model.
 - b. Please refer to Mr. Hevert's direct testimony at pages 29 and 30 in which he discusses the analytical benefits of the three-stage model. Mr. Hevert does not state anywhere in his testimony that his multi-stage model is an improvement over the constant-growth DCF model.

SPONSOR: Robert B. Hevert
Consultant

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AOBA DATA REQUEST NO. 9

QUESTION NO. 9-13

- Q.** Re: the Direct Testimony of witness Hevert from page 28, lined 16 through 20, please provide the data, analyses and workpapers upon which the witness relies to demonstrate that the combination of near-term, intermediate-term, and long-term growth rate estimates used in his Multi-Stage DCF analyses are more accurate and reliable than a constant growth rate assumption.

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.** Mr. Hevert did not state in his testimony that the growth rate estimates in his multi-stage DCF analysis are more accurate and reliable than the growth rate estimates in his constant growth DCF analysis. In addition, please refer to pages 29 and 30 of Mr. Hevert's direct testimony for his discussion of the analytical benefits of the multi-stage DCF.

SPONSOR: Robert B. Hevert
Consultant

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AOBA DATA REQUEST NO. 9

QUESTION NO. 9-30

- Q.** Re: the Direct Testimony of witness Hevert from page 61, lines 11 through 20, please:
- a. Verify that equity investors purchase shares of common stock in WGL Holdings, Inc. and not shares of Washington Gas Light Company stock.
 - b. Provide the workpapers, data, and analyses upon which the witness relies to assess the appropriateness of the relationship between Washington Gas' capital structure and the capital structure employed by its parent company, WGL Holdings, Inc.
 - c. If the current WGL Holdings, Inc. capital structure is maintained but the capital structures of its regulated and non-regulated affiliate operations are adjusted to bring the capital structure for each subsidiary more in-line with the overall capital structure for the holding company, indicate whether investors required returns increase, and if so, explain the basis for the witness' determination.

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.**
- a. Verified.
 - b. Mr. Hevert did not undertake such a study.
 - c. The request calls for speculation regarding changes to capital structure, especially regarding those entities outside of the regulatory purview, and is beyond the scope of Mr. Hevert's testimony. Mr. Hevert did not undertake a study of the issue posed in the request.

SPONSOR: Robert B. Hevert
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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WASHINGTON GAS'S RESPONSE
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AOBA DATA REQUEST NO. 9

QUESTION NO. 9-34

- Q.** Re: Exhibit WG (C)-4 that accompanies the Direct Testimony of witness Hevert, please provide the date(s) of the documents from which the referenced EPS Growth Rate Estimates for each listed company were derived and the time period address by the estimates derived:
- a. From Zacks
 - b. From First Call
 - c. From Value Line
 - d. For Retention Growth

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.**
- a. 01/04/16, five year expected earnings per share growth rate.
 - b. 01/04/16, five year expected earnings per share growth rate.
 - c. 12/4/15, estimated earnings growth rate from the midpoint of 2012 – 2014 to the midpoint of 2018 – 2020.
 - d. Same data as Part c., above.

SPONSOR: Robert B. Hevert
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 9

QUESTION NO. 9-35

- Q.** Re: Exhibit WG (C)-5 that accompanies the Direct Testimony of witness Hevert, please:
- a. Explain why the "Market Capitalization" amount in column [4] are not the same for the Bloomberg analysis and the Value Line analysis.
 - b. If Bloomberg and Value Line define market capitalization differently, provide the definition of Market Capitalization used by each organization in the development of the reported Market Capitalization data.
 - c. If the Bloomberg and Value Line "Market Capitalization" data are based on different points in time or different time periods, provide the date or period for which "Market Capitalization" was measured:
 - i. By Bloomberg
 - ii. By Value Line
 - d. Explain why Bloomberg has a positive number for "Market Capitalization" for every company listed, but Value Line shows either "-" or "na" for about 25 companies.

WASHINGTON GAS'S RESPONSE

05/16/2016

- A.**
- a. Bloomberg uses intraday prices in calculating the reported market capitalization while Value Line uses previous day's closing prices.
 - b. Please see the response to Part a., above.
 - c.
 - i. 12/31/15
 - ii. 12/31/15

d. Upon investigation of this request, it came to Mr. Hevert's attention that of the 25 tickers that were missing information:

- 4 tickers were not covered by Value Line Standard Edition
- 17 tickers were REITs, which had no measures of EPS growth from Value Line, but had market capitalization
- 4 tickers were non-REITs, which had "NMF" (no meaningful figure) for their EPS growth rates, but had market capitalization and dividend yields.

Since none of the 25 tickers referenced have projected EPS growth rates provided by Value Line, the missing data does not affect the Market Equity Risk Premium based on Value Line data on Exhibit WG (C)-5.

SPONSOR: Robert B. Hevert
Consultant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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**WASHINGTON GAS'S RESPONSE
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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-7

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 17, lines 1-7, please provide workpapers, data, analyses, and studies that constitute the Company's determination of Asset Optimization Revenues attributable to the District of Columbia by month:
- 1.** For the test year
 - 2.** For the three fiscal years immediately preceding the test year.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** See the attached spreadsheet "DR AOBA 10-7 Attachment 1 – Asset Optimization Revenues.xlsx" for requested detail that supports the per book information regarding Asset Optimization. The per book information contains both realized and unrealized Asset Optimization revenues and sharing. Actual sharing with customers is based on realized amounts only.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

Washington Gas Light Company
 Asset Optimization Revenues
 October 2011 through September 2015 (FY2012-FY2015)

	A = B + C + D		B		C		D		E		F		G = E + F		H		I		J = H + I		K		
	System	MD	Asset Optimization - Direct (Sharing)	VA	DC	System	Factor	DC	System	Factor	DC	System	Factor	DC	System	Factor	DC	System	Factor	DC	System	Factor	DC
Oct 2011	(1,772,291)	36,583	(1,820,570)	11,697	(128,960)	14.9863%	(19,316)	486,042	14.9863%	72,840	486,042	14.9863%	72,840	486,042	14.9863%	72,840	486,042	14.9863%	72,840	486,042	14.9863%	72,840	65,210
Nov 2011	(3,025,570)	(1,476,360)	(1,216,950)	(332,260)	4,366,326	14.9863%	654,349	877,344	14.9863%	123,988	877,344	14.9863%	123,988	877,344	14.9863%	123,988	877,344	14.9863%	123,988	877,344	14.9863%	123,988	446,077
Dec 2011	(10,347,682)	(5,575,483)	(3,560,257)	(1,211,942)	15,558,080	14.9863%	2,331,576	669,077	14.9863%	100,270	669,077	14.9863%	100,270	669,077	14.9863%	100,270	669,077	14.9863%	100,270	669,077	14.9863%	100,270	1,219,903
Jan 2012	(7,068,589)	(3,487,696)	(2,828,263)	(752,630)	10,257,209	14.9863%	1,531,173	731,935	14.9863%	109,690	731,935	14.9863%	109,690	731,935	14.9863%	109,690	731,935	14.9863%	109,690	731,935	14.9863%	109,690	894,233
Feb 2012	(7,561,421)	(3,512,836)	(3,272,335)	(776,250)	10,193,256	14.9863%	1,527,589	755,834	14.9863%	113,271	755,834	14.9863%	113,271	755,834	14.9863%	113,271	755,834	14.9863%	113,271	755,834	14.9863%	113,271	864,610
Mar 2012	2,765,728	900,012	1,690,781	174,934	(2,299,647)	14.9863%	(344,631)	731,680	14.9863%	109,652	731,680	14.9863%	109,652	731,680	14.9863%	109,652	731,680	14.9863%	109,652	731,680	14.9863%	109,652	(60,045)
Apr 2012	4,501,695	2,036,736	2,022,688	442,271	(5,812,956)	14.9863%	(871,145)	539,415	14.9863%	80,838	539,415	14.9863%	80,838	539,415	14.9863%	80,838	539,415	14.9863%	80,838	539,415	14.9863%	80,838	(348,036)
May 2012	(6,484,116)	(3,132,931)	(2,669,074)	(686,112)	9,015,606	14.9863%	1,351,103	545,449	14.9863%	81,743	545,449	14.9863%	81,743	545,449	14.9863%	81,743	545,449	14.9863%	81,743	545,449	14.9863%	81,743	746,734
Jun 2012	(4,462,786)	(2,174,949)	(1,817,877)	(469,960)	6,173,716	14.9863%	925,210	544,479	14.9863%	81,597	544,479	14.9863%	81,597	544,479	14.9863%	81,597	544,479	14.9863%	81,597	544,479	14.9863%	81,597	536,846
Jul 2012	(9,678,226)	(4,675,295)	(3,959,159)	(1,003,772)	13,189,542	14.9863%	1,976,620	447,536	14.9863%	67,069	447,536	14.9863%	67,069	447,536	14.9863%	67,069	447,536	14.9863%	67,069	447,536	14.9863%	67,069	1,039,917
Aug 2012	(8,674,700)	(4,106,729)	(3,649,962)	(918,008)	12,062,929	14.9863%	1,807,783	697,066	14.9863%	104,464	697,066	14.9863%	104,464	697,066	14.9863%	104,464	697,066	14.9863%	104,464	697,066	14.9863%	104,464	994,239
Sep 2012	6,110,438	4,533,254	1,938,504	(351,120)	4,617,196	14.9863%	691,946	2,134,586	14.9863%	319,895	2,134,586	14.9863%	319,895	2,134,586	14.9863%	319,895	2,134,586	14.9863%	319,895	2,134,586	14.9863%	319,895	660,720
FY2012	(45,701,520)	(20,645,694)	(19,182,673)	(5,873,153)	77,197,295	14.9863%	11,568,246	9,110,442	14.9863%	1,365,316	9,110,442	14.9863%	1,365,316	9,110,442	14.9863%	1,365,316	9,110,442	14.9863%	1,365,316	9,110,442	14.9863%	1,365,316	7,060,409
Oct 2012	5,271,568	3,039,595	2,218,141	13,832	437,833	14.9863%	65,615	783,410	14.9863%	117,404	783,410	14.9863%	117,404	783,410	14.9863%	117,404	783,410	14.9863%	117,404	783,410	14.9863%	117,404	196,851
Nov 2012	5,481,616	1,439,135	2,735,192	1,307,289	(17,376,939)	14.9863%	(2,604,155)	810,744	14.9863%	121,500	810,744	14.9863%	121,500	810,744	14.9863%	121,500	810,744	14.9863%	121,500	810,744	14.9863%	121,500	(1,176,365)
Dec 2012	(2,066,125)	(916,823)	(899,745)	(249,557)	3,293,543	14.9863%	493,579	783,931	14.9863%	117,482	783,931	14.9863%	117,482	783,931	14.9863%	117,482	783,931	14.9863%	117,482	783,931	14.9863%	117,482	361,504
Jan 2013	(10,260,679)	(4,606,932)	(4,423,375)	(1,230,753)	16,355,519	14.9863%	2,451,082	791,144	14.9863%	118,563	791,144	14.9863%	118,563	791,144	14.9863%	118,563	791,144	14.9863%	118,563	791,144	14.9863%	118,563	1,338,893
Feb 2013	4,150,378	1,863,370	1,789,226	497,832	(6,615,700)	14.9863%	(991,447)	758,024	14.9863%	113,600	758,024	14.9863%	113,600	758,024	14.9863%	113,600	758,024	14.9863%	113,600	758,024	14.9863%	113,600	(800,016)
Mar 2013	9,889,934	4,440,105	4,263,546	1,186,282	(15,764,550)	14.9863%	(2,362,518)	(777,759)	14.9863%	(116,557)	(777,759)	14.9863%	(116,557)	(777,759)	14.9863%	(116,557)	(777,759)	14.9863%	(116,557)	(777,759)	14.9863%	(116,557)	(647,828)
Apr 2013	5,929,422	2,662,076	2,556,171	711,225	(9,451,496)	14.9863%	(1,416,437)	382,837	14.9863%	57,373	382,837	14.9863%	57,373	382,837	14.9863%	57,373	382,837	14.9863%	57,373	382,837	14.9863%	57,373	686,005
May 2013	(4,783,504)	(2,147,563)	(2,062,166)	(573,775)	7,624,687	14.9863%	1,143,656	781,534	14.9863%	117,123	781,534	14.9863%	117,123	781,534	14.9863%	117,123	781,534	14.9863%	117,123	781,534	14.9863%	117,123	686,005
Jun 2013	2,307,801	1,036,092	994,894	276,815	(3,678,601)	14.9863%	(551,285)	591,477	14.9863%	88,640	591,477	14.9863%	88,640	591,477	14.9863%	88,640	591,477	14.9863%	88,640	591,477	14.9863%	88,640	(185,830)
Jul 2013	60,617,283	27,214,249	26,132,086	7,270,948	(96,623,899)	14.9863%	(14,480,319)	586,315	14.9863%	87,867	586,315	14.9863%	87,867	586,315	14.9863%	87,867	586,315	14.9863%	87,867	586,315	14.9863%	87,867	(7,121,504)
Aug 2013	13,200,363	5,955,481	5,653,730	1,591,152	(21,141,870)	14.9863%	(3,168,827)	597,686	14.9863%	89,571	597,686	14.9863%	89,571	597,686	14.9863%	89,571	597,686	14.9863%	89,571	597,686	14.9863%	89,571	(1,488,105)
Sep 2013	(33,358,851)	(14,973,483)	(14,368,632)	(4,016,736)	53,378,557	14.9863%	7,999,455	623,634	14.9863%	93,460	623,634	14.9863%	93,460	623,634	14.9863%	93,460	623,634	14.9863%	93,460	623,634	14.9863%	93,460	(5,632,011)
FY2013	56,373,205	25,003,582	24,589,069	6,784,554	(89,565,916)	14.9863%	(13,422,591)	6,712,978	14.9863%	1,006,025	6,712,978	14.9863%	1,006,025	6,712,978	14.9863%	1,006,025	6,712,978	14.9863%	1,006,025	6,712,978	14.9863%	1,006,025	7,060,409
Oct 2013	43,301,709	14,993,616	23,063,852	5,244,241	(68,496,545)	14.9480%	(10,238,874)	809,462	14.9480%	120,999	809,462	14.9480%	120,999	809,462	14.9480%	120,999	809,462	14.9480%	120,999	809,462	14.9480%	120,999	(4,873,635)
Nov 2013	63,717,579	25,381,309	30,672,416	7,663,854	(100,973,052)	14.9480%	(15,093,467)	828,180	14.9480%	123,797	828,180	14.9480%	123,797	828,180	14.9480%	123,797	828,180	14.9480%	123,797	828,180	14.9480%	123,797	(7,305,816)
Dec 2013	(72,882,866)	(29,002,415)	(29,002,415)	(8,766,708)	115,495,505	14.9480%	17,264,285	828,541	14.9480%	123,650	828,541	14.9480%	123,650	828,541	14.9480%	123,650	828,541	14.9480%	123,650	828,541	14.9480%	123,650	8,621,428
Jan 2014	335,780,744	54,096,990	65,362,242	16,331,511	(215,171,431)	14.9480%	(32,163,857)	4,014,614	14.9480%	600,105	4,014,614	14.9480%	600,105	4,014,614	14.9480%	600,105	4,014,614	14.9480%	600,105	4,014,614	14.9480%	600,105	(15,232,241)
Feb 2014	(41,354,344)	(16,473,133)	(19,507,178)	(4,974,032)	65,534,016	14.9480%	9,796,034	5,220,124	14.9480%	780,305	5,220,124	14.9480%	780,305	5,220,124	14.9480%	780,305	5,220,124	14.9480%	780,305	5,220,124	14.9480%	780,305	5,602,307
Mar 2014	(9,200,703)	(6,549,812)	(11,583,472)	(1,067,419)	14,063,498	14.9480%	2,107,214	3,453,724	14.9480%	516,763	3,453,724	14.9480%	516,763	3,453,724	14.9480%	516,763	3,453,724	14.9480%	516,763	3,453,724	14.9480%	516,763	1,551,058
Apr 2014	9,265,667	3,744,000	4,326,252	1,195,416	(15,749,881)	14.9480%	(2,354,295)	1,056,376	14.9480%	157,907	1,056,376	14.9480%	157,907	1,056,376	14.9480%	157,907	1,056,376	14.9480%	157,907	1,056,376	14.9480%	157,907	(2,000,972)
May 2014	(17,651,165)	(7,125,702)	(8,258,414)	(2,267,050)	29,860,899	14.9480%	4,464,807	790,433	14.9480%	118,154	790,433	14.9480%	118,154	790,433	14.9480%	118,154	790,433	14.9480%	118,154	790,433	14.9480%	118,154	2,315,912
Jun 2014	5,597,696	2,259,755	2,618,990	718,951	(9,472,344)	14.9480%	(1,415,927)	860,187	14.9480%	128,581	860,187	14.9480%	128,581	860,187	14.9480%	128,581	860,187	14.9480%	128,581	860,187	14.9480%	128,581	(568,396)
Jul 2014	(63,698,317)	(25,715,126)	(29,802,881)	(8,181,310)	107,790,645	14.9480%	16,112,562	867,564	14.9480%	129,684	867,564	14.9480%	129,684	867,564	14.9480%	129,684	867,564						

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**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-9

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 25, line 18, through page 26, line 14, please:
- a. Provide the AOC firm service volumes by rate schedule by month for the test year and for the two prior fiscal years.
 - b. Provide the AOC interruptible service volumes by month for the test year and for the two prior fiscal years.
 - c. Provide the AOC firm service revenue by charge by rate schedule by month for the test year and for the two prior fiscal years.
 - d. Provide the AOC interruptible service revenue by charge by month for the test year and for the two prior fiscal years.
 - e. Provide the AOC firm service peak usage charge billing units by month for the test year and for the two prior fiscal years.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a & b. Please reference the attachment for AOBA Data Request 5-21.
 - c & d. Please reference the attached schedule outlining the revenue by charge by rate class by month for the three years ending September 30, 2015.
 - e. Peak usage is not charged to this customer. Please see the attached schedule outlining all revenue charged to the customer for the period requested.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

Revenues by Charge for the Architect of the Capital Account
 For the Three Years Ending September 30, 2015

Month	Area	Rate	Class	Type	Account Number	System Level	System Bill Type	System Charge Amount	DC Right of Way Tax	Balancing Charge	SE Trust Fund	WG Purchases	Delivery Tax	EA Trust Fund	Commodity Charge	Delivery Charge	Other Charge	Plant Recovery Adjustment	Accelerated Pipeline Replacement Program
Oct-2012	DC	81	Interruptible	1	1	1	64	22,561	1,282	8,973	49,846	3,846	101,262	513	-	138,411	-	-	-
Nov-2012	DC	81	Interruptible	1	1	1	64	30,706	1,745	12,213	67,841	5,234	138,411	688	-	183,859	-	-	-
Dec-2012	DC	81	Interruptible	1	1	1	64	41,151	2,338	16,367	90,917	7,014	183,859	2,455	-	190,416	-	-	-
Jan-2013	DC	81	Interruptible	1	1	1	64	42,626	2,422	16,954	94,177	7,266	241,370	3,227	-	231,778	-	-	-
Feb-2013	DC	81	Interruptible	1	1	1	64	54,094	3,074	21,515	119,514	9,221	221,790	2,964	-	231,778	-	-	-
Mar-2013	DC	81	Interruptible	1	1	1	64	51,935	2,951	20,656	109,778	8,469	221,790	1,929	-	144,878	-	-	-
Apr-2013	DC	81	Interruptible	1	1	1	64	51,381	2,823	19,762	109,778	8,469	221,790	1,929	-	144,878	-	-	-
May-2013	DC	81	Interruptible	1	1	1	64	33,434	1,837	12,859	71,434	5,511	121,707	1,820	-	99,591	-	-	-
Jun-2013	DC	81	Interruptible	1	1	1	64	21,452	1,543	10,803	60,011	4,630	98,927	1,315	-	102,627	-	-	-
Jul-2013	DC	81	Interruptible	1	1	1	78	17,521	1,261	8,824	49,015	3,782	112,784	2,430	-	112,784	-	-	-
Aug-2013	DC	81	Interruptible	1	1	1	80	17,403	1,252	8,764	48,684	3,756	138,090	3,243	-	138,090	-	-	-
Sep-2013	DC	81	Interruptible	1	1	1	80	18,061	1,299	9,095	50,524	3,898	198,421	4,670	-	198,421	-	-	-
Oct-2013	DC	81	Interruptible	1	1	1	80	19,866	1,429	10,004	55,575	4,288	236,258	5,565	-	236,258	-	-	-
Nov-2013	DC	81	Interruptible	1	1	1	80	24,364	1,753	12,270	68,158	5,258	212,009	5,118	-	212,009	-	-	-
Dec-2013	DC	81	Interruptible	1	1	1	80	35,088	2,524	17,670	98,158	7,573	243,960	5,747	-	243,960	-	-	-
Jan-2014	DC	81	Interruptible	1	1	1	80	41,813	3,008	21,057	116,972	9,024	211,994	5,050	-	211,994	-	-	-
Feb-2014	DC	81	Interruptible	1	1	1	80	38,456	2,767	18,898	107,579	8,099	159,226	3,743	-	159,226	-	-	-
Mar-2014	DC	81	Interruptible	1	1	1	80	43,182	3,107	21,747	120,802	9,320	121,106	2,841	-	121,106	-	-	-
Apr-2014	DC	81	Interruptible	1	1	1	80	36,305	2,730	18,769	106,145	8,096	100,671	2,357	-	100,671	-	-	-
May-2014	DC	81	Interruptible	1	1	1	80	26,907	2,023	14,162	78,668	6,069	89,414	2,262	-	89,414	-	-	-
Jun-2014	DC	81	Interruptible	1	1	1	80	21,499	1,536	10,749	59,713	4,607	94,323	2,091	-	94,323	-	-	-
Jul-2014	DC	81	Interruptible	1	1	1	80	17,840	1,274	8,920	49,551	3,823	109,486	4,161	-	109,486	-	-	-
Aug-2014	DC	81	Interruptible	1	1	1	80	17,115	1,222	8,557	47,536	3,667	168,714	6,433	-	168,714	-	-	-
Sep-2014	DC	81	Interruptible	1	1	1	80	15,825	1,130	7,912	43,954	3,391	202,910	7,745	-	202,910	-	-	-
Oct-2014	DC	81	Interruptible	1	1	1	80	16,704	1,193	8,352	46,395	3,579	140,446	5,349	-	140,446	-	-	-
Nov-2014	DC	81	Interruptible	1	1	1	80	19,418	1,387	9,709	53,935	3,537	83,354	3,159	-	83,354	-	-	-
Dec-2014	DC	81	Interruptible	1	1	1	80	30,022	2,144	15,011	83,386	5,468	102,935	3,910	-	102,935	-	-	-
Jan-2015	DC	81	Interruptible	1	1	1	80	36,144	2,582	18,072	100,390	6,563	31,174	1,157	-	31,174	-	-	-
Feb-2015	DC	81	Interruptible	1	1	1	80	24,961	1,545	12,481	69,330	4,547	-	-	-	-	-	-	-
Mar-2015	DC	81	Interruptible	1	1	1	80	14,740	10,611	7,370	40,941	2,685	-	-	-	-	-	-	-
Apr-2015	DC	81	Interruptible	1	1	1	80	18,246	7,884	9,123	50,677	3,323	-	-	-	-	-	-	-
May-2015	DC	81	Interruptible	1	1	1	80	5,572	2,638	2,699	14,994	983	-	-	-	-	-	-	-
Jun-2015	DC	81	Interruptible	1	1	1	80	-	-	-	-	-	-	-	-	-	-	-	-
Jul-2015	DC	81	Interruptible	1	1	1	80	-	-	-	-	-	-	-	-	-	-	-	-
Aug-2015	DC	81	Interruptible	1	1	1	80	-	-	-	-	-	-	-	-	-	-	-	-
Sep-2015	DC	81	Interruptible	1	1	1	80	-	-	-	-	-	-	-	-	-	-	-	-
Feb-2015	DC	35	Firm	1	1	1	80	19,652	7,931	9,826	54,583	3,579	234,277	4,211	-	234,277	-	-	-
Mar-2015	DC	35	Firm	1	1	1	80	17,730	7,409	8,865	49,246	3,229	211,371	3,799	-	211,371	-	-	-
Apr-2015	DC	35	Firm	1	1	1	80	19,614	8,196	9,807	54,479	3,573	233,830	4,203	-	233,830	-	-	-
May-2015	DC	35	Firm	1	1	1	80	19,497	7,893	9,445	52,466	3,441	225,192	4,048	-	225,192	-	-	-
Jun-2015	DC	35	Firm	1	1	1	80	25,556	7,494	8,967	49,811	3,267	213,796	3,843	-	213,796	-	-	-
Jul-2015	DC	35	Firm	1	1	1	80	25,888	7,591	9,063	50,458	3,309	216,575	3,893	-	216,575	-	-	-
Aug-2015	DC	35	Firm	1	1	1	80	23,533	6,901	8,257	45,859	3,008	195,875	3,539	-	195,875	-	-	-
Sep-2015	DC	35	Firm	1	1	1	80	23,093	6,772	8,103	45,011	2,952	193,193	3,473	-	193,193	-	-	-

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-10

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 26, lines 7-9, please explain and justify the appropriateness of the Company's inclusion of all AOC volumes in interruptible service volumes in the Revenue Study (WG (D)-7).

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The amounts were included in interruptible service volumes pending the Commission action in Formal Case No. 1133.

Please refer to Exhibit WG (2D), the Supplemental Direct Testimony of Robert E. Tuoriniemi, reflecting the Commission Order No. 18185, issued in Formal Case No. 1133, where the Commission directed Washington Gas to file supplemental testimony reflecting the impact of its decision to approve a Special Contract for the U.S. General Services Administration account for the Architect of the Capitol ("AOC") on the revenue requirement in Formal Case No 1137.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-11

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 26, lines 12-14, please:
- a.** Verify that the referenced 8,519,000 figure is intended to reflect test year therm use for AOC.
 - b.** Verify that the referenced 8,519,000 figure is intended to reflect the sum of AOC firm and interruptible service volumes for the test year in this proceeding, and if that is correct, provide the workpapers, data, analyses, and assumptions relied upon to develop the AOC test year volumes by month on a normal weather basis:
 1. For firm service
 2. For interruptible service

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a.** That is correct. The referenced 8,519,000 figure was the initial estimate to reflect test year firm therm use for AOC.
 - b.** Please refer to Exhibit WG (2D)-4 for the calculation and supporting documentation used to develop the AOC test year volumes by month on a normal weather basis for both firm and interruptible service. The interruptible service can be calculated as the difference between total normal weather therms and the firm normal weather therms.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-12

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 27, line 11, through page 28, line 6, please:
- a. Verify that although the Company represents that "peak usage" is "*a measure of the amount of gas a customer uses on the coldest days of the year,*" that is not what the measure of "peak usage" that the Company uses under its tariff actually measures.
 - b. Verify that under the Company's tariff the "Peak Usage Charge" is applied to "*the customer's maximum billing month usage during the immediately preceding November through April billing periods,*" and the maximum billing month is defined as "*the month in which the maximum average daily consumption (total therms/cycle billing days) occurs.*"
 - c. Verify that under the provisions of the Company's tariff it is possible that an individual customer's peak usage may occur in a month other than the month in which the highest monthly usage for the customer's rate class occurs.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. The language cited by Company Witness Tuoriniemi in his testimony is extracted directly from the Company's tariff and when read in its entirety fully defines the peak usage charge.
 - b. AOBA correctly cites the tariff language.
 - c. It is possible that an individual customer's peak usage may occur in a month that differs from the class monthly usage. In this proceeding that amount is unknown at this time and the peak usage assumption provides a reasonable approximation of the peak month.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-13

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 27, line 11, through page 28, line 6, please:
- a. Provide the analyses the Company relies upon for each C&I and each GMA rate classification to assess the relationship between the therms of gas use in the maximum usage month for the class and the sum of the therms of maximum month gas use for individual customers served under each rate classification for the immediately preceding November - April billing period.
 - b. Provide the actual peak usage charge billing determinants for each rate classification for each month of the Company's test year and each month of the three immediately preceding fiscal years showing peak usage charge separately for C&I and GMA customers within each existing rate classification.
 - c. Provide the numbers of C&I customers for which the class' peak usage month during the test year was not the same as the calendar month in the immediately preceding November - April billing period in which the customer's maximum billing month usage was experienced.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. The Company's computation does not rely upon the relationship of each C&I and GMA customer class to individual customers' prior November through April usage but rather uses aggregate amounts as a proxy to estimate future peak usage charges.
 - b. Actual Peak Usage billing determinants and charges for each rate classification for the current test period and three preceding fiscal years is reported in the attached spreadsheet labeled "DR AOBA 10-13

Attachment 1 – Peak Usage Charge and Therms (FY2012 – FY2015).xlsx”. In pulling the billing determinants for the peak usage charge for the prior fiscal years, the Company identified that Rate Schedule 2 and 2A customers were billed at an incorrect rate for the November 2013 - April 2014 billing periods. Instead of being billed at the \$0.0272 per therm rate in the Company's tariff, customers were billed at a rate of approximately \$0.0253 cents per therm, which was the rate prior to the approved increase in Formal Case No. 1093.

- c. The number of C&I customers for which the Class' peak usage month during the test year was not the same as the calendar month in the immediately preceding November – April billing period in which the customer's maximum billing usage was experienced was 6,068.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

Washington Gas Light Company
 Peak Usage Charge and Therms
 Four Years Ending September 30, 2015

	DC Res Htg / HC	DC Res Non Htg - IMA	DC Res Non Htg - OTH	DC C&J Htg / HC < 3075 (Less Special Contracts)	DC C&J Htg / HC > 3075	DC C&J Non Htg (Less Special Contracts)	DC GMA Htg / HC < 3075	DC GMA Htg / HC > 3075	DC GMA Non Htg	DC Interruptible (Plus Special Contracts)	Total
Peak Usage Charge											
Sep-2015	\$ -	\$ -	\$ -	\$ (37)	\$ (430)	\$ (1)	\$ -	\$ 27	\$ -	\$ -	\$ (440)
Aug-2015	-	-	-	(413)	591	(806)	46	27	-	-	(554)
Jul-2015	-	-	-	122	(361)	(1,843)	-	3	-	-	(2,079)
Jun-2015	-	-	-	(454)	(2,654)	29	(36)	(714)	(242)	-	(4,072)
May-2015	-	-	-	(297)	(323)	857	(4)	282	(1,546)	-	(1,031)
Apr-2015	-	-	-	41,304	292,466	54,405	11,278	120,915	16,469	-	536,838
Mar-2015	-	-	-	33,896	292,990	16,626	10,267	108,306	14,137	-	476,222
Feb-2015	-	-	-	33,708	305,862	50,223	10,743	140,340	15,997	-	556,872
Jan-2015	-	-	-	40,343	313,243	48,064	10,909	138,322	15,749	-	566,631
Dec-2014	-	-	-	37,358	309,670	47,842	7,682	137,486	16,090	-	556,128
Nov-2014	-	-	-	34,362	306,933	47,706	5,761	138,298	16,124	-	549,185
Oct-2014	-	-	-	52	127	165	1	-	-	-	344
\$	\$ -	\$ -	\$ -	\$ 219,945	\$ 1,818,115	\$ 263,268	\$ 56,648	\$ 783,291	\$ 92,777	\$ -	\$ 3,234,043
Sep-2014	\$ -	\$ -	\$ -	\$ (1,142)	\$ (1,039)	\$ 8	\$ 123	\$ (2)	\$ 1	\$ -	\$ (2,050)
Aug-2014	-	-	-	(1)	(724)	(8)	(1)	-	(1)	-	(736)
Jul-2014	-	-	-	2,035	1,620	(45)	(0)	(31)	(58)	-	3,522
Jun-2014	-	-	-	212	(9,121)	(100)	(101)	(439)	(235)	-	(9,784)
May-2014	-	-	-	2,272	4,639	347	178	(1,224)	9	-	6,221
Apr-2014	-	-	-	140,620	195,992	40,775	5,481	116,799	12,892	-	512,559
Mar-2014	-	-	-	134,527	251,953	40,540	5,085	117,430	14,728	-	564,262
Feb-2014	-	-	-	133,298	258,144	40,386	5,212	119,385	14,349	-	570,773
Jan-2014	-	-	-	129,744	254,069	39,433	3,691	117,339	14,061	-	558,337
Dec-2013	-	-	-	125,227	253,075	39,517	(15,583)	117,090	14,185	-	533,512
Nov-2013	-	-	-	121,107	241,528	39,094	19,110	115,988	13,560	-	550,386
Oct-2013	-	-	-	138	(1,142)	5	0	-	-	-	(998)
\$	\$ -	\$ -	\$ -	\$ 788,037	\$ 1,448,994	\$ 239,954	\$ 23,193	\$ 702,336	\$ 83,491	\$ -	\$ 3,286,005

Washington Gas Light Company
 Peak Usage Charge and Therms
 Four Years Ending September 30, 2015

Peak Usage Charge	DC Res Htg / HC	DC Res Non Htg - IMA	DC Res Non Htg - OTH	DC C&I Htg / HC < 3075		DC C&I Non Htg (Less Special Contracts)		DC GMA Htg / HC < 3075	DC GMA Htg / HC > 3075	DC GMA Htg / Htg	DC GMA Non Htg	Interruptible (Plus Special Contracts)	Total
				(Less Special Contracts)	(Less Special Contracts)								
Sep-2013	\$ -	\$ -	\$ -	\$ -	\$ (664)	\$ (34)	\$ (15)	\$ (24)	\$ -	\$ -	\$ -	\$ (737)	
Aug-2013	-	-	-	720	(1,519)	(569)	(2)	179	(0)	-	-	(1,191)	
Jul-2013	-	-	-	(28)	(1,384)	322	(4)	(556)	-	-	-	(1,649)	
Jun-2013	-	-	-	5,762	(448)	81	-	(305)	-	-	-	5,098	
May-2013	-	-	-	2,481	9,612	(1,968)	(26)	(140,919)	96	-	-	(130,722)	a/
Apr-2013	-	-	-	60,460	220,140	38,791	3,940	124,071	15,766	-	-	463,168	a/
Mar-2013	-	-	-	58,885	220,993	37,236	4,607	123,139	17,626	-	-	462,486	a/
Feb-2013	-	-	-	49,310	226,978	39,229	3,388	129,301	17,382	-	-	465,588	a/
Jan-2013	-	-	-	44,036	235,172	37,388	3,653	110,462	17,622	-	-	448,333	a/
Dec-2012	-	-	-	45,872	238,136	37,744	2,966	67,984	16,892	-	-	409,594	a/
Nov-2012	-	-	-	40,737	236,058	36,503	2,820	180,317	17,301	-	-	513,736	a/
Oct-2012	-	-	-	(68)	(2,854)	(290)	82	115	(19)	-	-	(3,035)	
	\$ -	\$ -	\$ -	\$ 308,167	\$ 1,380,220	\$ 224,435	\$ 21,410	\$ 593,764	\$ 102,673	\$ -	\$ -	\$ 2,630,669	
Sep-2012	\$ -	\$ -	\$ -	\$ 719	\$ (124)	\$ (116)	\$ (20)	\$ (1,343)	\$ (5)	\$ -	\$ -	\$ (889)	
Aug-2012	-	-	-	(936)	(8,488)	19	36	(46)	0	-	-	(9,415)	
Jul-2012	-	-	-	(122)	(5,724)	167	(495)	(815)	69	-	-	(6,920)	
Jun-2012	-	-	-	(322)	(7,208)	(1,291)	(477)	(525)	(178)	-	-	(10,000)	
May-2012	-	-	-	(1,371)	(6,365)	140	7	1,515	239	-	-	(5,835)	
Apr-2012	-	-	-	58,036	283,938	41,209	6,891	145,299	16,589	-	-	551,961	a/
Mar-2012	-	-	-	42,069	285,010	14,650	7,530	152,220	16,664	-	-	518,143	a/
Feb-2012	-	-	-	41,773	264,273	26,280	5,457	141,626	17,320	-	-	496,728	a/
Jan-2012	-	-	-	40,034	277,711	49,064	7,440	157,658	14,774	-	-	546,680	a/
Dec-2011	-	-	-	32,457	278,391	49,326	4,500	143,239	11,198	-	-	519,112	
Nov-2011	-	-	-	30,053	264,373	44,252	4,878	141,822	10,676	-	-	496,054	
Oct-2011	-	-	-	287	(337)	351	165	(81)	-	-	-	385	
	\$ -	\$ -	\$ -	\$ 242,678	\$ 1,625,450	\$ 224,051	\$ 35,912	\$ 880,570	\$ 87,345	\$ -	\$ -	\$ 3,096,006	

a/ During the noted months, peak usage details for 45 accounts were anomalous and therefore excluded within the amounts shown.

Washington Gas Light Company
 Peak Usage Charge and Therms
 Four Years Ending September 30, 2015

	DC Res Htg / HC	DC Res Non Htg - IMA	DC Res Non Htg - OTH	DC C&I Htg / HC < 3075 (Less Special Contracts)	DC C&I Htg / Special Contracts	DC GMA Htg / HC < 3075	DC GMA Htg / HC > 3075	DC GMA Htg / HC < 3075	DC GMA Htg / HC > 3075	DC GMA Non Htg	DC Interruptible (Plus Special Contracts)	Total
Peak Usage Therms												
Sep-2015	-	-	-	(1,281)	208	(15,799)	-	992	-	-	-	(15,879)
Aug-2015	-	-	-	(14,974)	(28,564)	22,108	1,708	1,005	-	-	-	(18,717)
Jul-2015	-	-	-	4,836	(67,759)	(12,440)	-	189	-	-	-	(75,175)
Jun-2015	-	-	-	(16,084)	1,224	(79,616)	(1,210)	(24,535)	(8,645)	-	-	(128,866)
May-2015	-	-	-	(9,402)	33,243	1,862	(102)	10,531	(56,845)	-	-	(20,713)
Apr-2015	-	-	-	1,539,395	2,000,820	10,776,968	415,166	4,487,649	605,544	-	-	19,825,542
Mar-2015	-	-	-	1,254,610	616,932	10,804,886	377,589	3,996,976	520,401	-	-	17,571,394
Feb-2015	-	-	-	1,252,542	1,846,704	11,251,509	395,005	5,167,791	588,491	-	-	20,502,041
Jan-2015	-	-	-	1,488,471	1,780,172	11,541,610	401,585	5,090,904	584,246	-	-	20,887,987
Dec-2014	-	-	-	1,381,959	1,760,988	11,540,807	286,016	5,058,933	591,775	-	-	20,620,478
Nov-2014	-	-	-	1,271,413	1,758,678	11,301,156	212,006	5,099,804	597,822	-	-	20,240,877
Oct-2014	-	-	-	4,247	7,555	11,925	60	-	-	-	-	23,786
	-	-	-	8,156,732	9,710,202	67,144,975	2,087,822	28,890,237	3,422,789	-	-	119,412,756
Sep-2014	-	-	-	(44,164)	324	(41,067)	6,248	(60)	57	-	-	(78,662)
Aug-2014	-	-	-	(31)	169	(24,182)	(57)	-	(52)	-	-	(24,154)
Jul-2014	-	-	-	80,593	875	74,767	1	972	(398)	-	-	156,810
Jun-2014	-	-	-	8,731	(3,710)	(352,369)	(644)	(9,200)	163	-	-	(357,029)
May-2014	-	-	-	92,699	14,528	373,793	7,227	(42,475)	2,395	-	-	448,167
Apr-2014	-	-	-	5,592,395	1,617,353	7,789,163	219,579	4,626,134	509,838	-	-	20,354,461
Mar-2014	-	-	-	5,336,348	1,607,669	9,995,453	201,192	4,651,157	582,215	-	-	22,374,034
Feb-2014	-	-	-	5,277,618	1,602,083	10,485,710	206,670	4,734,861	567,187	-	-	22,874,129
Jan-2014	-	-	-	5,139,884	1,571,131	10,114,230	146,055	4,646,026	556,504	-	-	22,173,831
Dec-2013	-	-	-	4,982,670	1,563,657	10,105,677	(609,794)	4,650,465	561,365	-	-	21,254,040
Nov-2013	-	-	-	4,798,342	1,546,713	9,578,545	889,227	4,586,527	536,097	-	-	21,915,451
Oct-2013	-	-	-	6,823	771	30,762	4	-	-	-	-	38,360
	-	-	-	31,271,908	9,521,562	58,130,483	1,045,709	27,844,407	3,315,370	-	-	131,129,438

Washington Gas Light Company
 Peak Usage Charge and Therms
 Four Years Ending September 30, 2015

	DC Res Htg / HC	DC Res Non Htg - IMA	DC Res Non Htg - OTH	DC C&I Htg / HC < 3075 (Less Special Contracts)	DC C&I Htg / HC > 3075	DC C&I Non Htg (Less Special Contracts)	DC GMA Htg / HC < 3075	DC GMA Htg / HC > 3075	DC GMA Non Htg	Interruptible (Plus Special Contracts)	Total
Peak Usage Therms											
Sep-2013	-	-	-	-	(26,240)	(1,122)	(581)	(736)	-	-	(28,678)
Aug-2013	-	-	-	29,539	(40,244)	(22,483)	(70)	17,212	(1)	-	(16,046)
Jul-2013	-	-	-	(949)	(50,772)	18,764	(174)	(21,969)	-	-	(55,101)
Jun-2013	-	-	-	281,224	(10,864)	10,195	-	(12,043)	713	-	269,226
May-2013	-	-	-	144,104	456,267	(70,343)	(599)	(5,533,905)	7,846	-	(4,996,630) a/
Apr-2013	-	-	-	2,421,414	9,081,694	1,536,528	160,858	4,905,293	624,856	-	18,730,844 a/
Mar-2013	-	-	-	2,398,322	8,767,934	1,478,478	206,997	4,903,375	696,786	-	18,451,892 a/
Feb-2013	-	-	-	1,956,236	9,026,915	1,557,864	134,589	5,132,858	688,377	-	18,496,838 a/
Jan-2013	-	-	-	1,746,913	9,496,762	1,494,005	147,552	4,366,097	696,675	-	17,948,003 a/
Dec-2012	-	-	-	1,817,664	9,437,862	1,495,150	117,233	2,687,458	688,222	-	16,223,589 a/
Nov-2012	-	-	-	1,614,363	9,347,160	1,446,323	111,481	7,149,115	685,013	-	20,353,455 a/
Oct-2012	-	-	-	26,246	(104,437)	(9,767)	13,223	7,822	(101)	-	(67,014)
	-	-	-	12,435,075	55,382,037	8,933,592	890,511	23,600,577	4,068,385	-	105,310,176
Sep-2012	-	-	-	37,632	24,419	(3,001)	(807)	(53,080)	63	-	5,226
Aug-2012	-	-	-	(33,900)	(253,188)	757	1,430	8,505	-	-	(276,396)
Jul-2012	-	-	-	(4,812)	(143,298)	9,148	(19,544)	(14,064)	16,762	-	(155,811)
Jun-2012	-	-	-	(4,620)	(160,158)	(45,484)	(18,660)	(20,740)	(3,243)	-	(252,905)
May-2012	-	-	-	184,451	(163,220)	20,225	270	74,354	18,188	-	134,267
Apr-2012	-	-	-	2,324,056	11,558,053	1,636,791	274,235	5,957,642	669,616	-	22,420,394 a/
Mar-2012	-	-	-	1,799,910	11,553,536	602,560	306,343	6,606,476	682,418	-	21,551,242 a/
Feb-2012	-	-	-	1,737,411	11,181,880	1,143,967	339,302	6,332,998	751,214	-	21,486,773 a/
Jan-2012	-	-	-	1,630,547	11,204,696	1,944,537	321,245	6,388,342	929,918	-	22,419,285 a/
Dec-2011	-	-	-	1,296,197	11,020,094	1,955,823	177,937	5,662,751	678,283	-	20,791,084
Nov-2011	-	-	-	1,192,103	10,694,416	1,749,851	200,803	5,636,031	537,486	-	20,010,689
Oct-2011	-	-	-	12,913	120,004	16,367	14,510	49,135	-	-	212,928
	-	-	-	10,171,887	66,637,233	9,031,540	1,597,062	36,628,349	4,280,704	-	128,346,775

a/ During the noted months, peak usage details for 45 accounts were anomalous and therefore excluded within the amounts shown.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-18

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 30, lines 10-16, please:
- a. Verify that the referenced \$61.2 million ratemaking adjustment to increase delivery service revenues is reflected in Exhibit WG (D)-3, Adjustment 1 of 37, Column D, Line 7.
 - b. Verify that the vast majority of the \$61.2 million increase results from the reallocation of revenue from Transportation Service customers from "Other Miscellaneous Revenue" to "Delivery of Gas Revenue."
 - c. Document the exclusion of Special Contract revenue from Delivery of Gas Revenue, or if Special Contract Revenue is included in the "Ratemaking Amount" for "Sub-total Delivery Service Revenue," document the amounts of Special Contract revenue included.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- (a) The \$61.2 million ratemaking adjustment to increase delivery service revenues is reflected in Exhibit WG (D)-3, Adjustment 1 of 37, Column D, Line 7.
 - (b) Included in the \$61.2 million increase is \$72.3 million from the reclassification from Transportation Service customers from "Other Miscellaneous Revenue" to "Delivery of Gas Revenue."
 - (c) At the time of the filing of the Direct Testimony it was excluded from the revenues.

Please refer to Exhibit WG (2D), the Supplemental Direct Testimony of Robert E. Tuoriniemi, reflecting the Commission Order No. 18185, issued in Formal Case

No. 1133, where the Commission directed Washington Gas to file supplemental testimony reflecting the impact its decision to approve a Special Contract for the U.S. General Services Administration account for the Architect of the Capitol ("AOC") on the revenue requirement in Formal Case No 1137.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-19

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 32, lines 17-18, please:
- a. Provide the workpapers, data, analyses and studies relied upon to assess the relationship between increases or decreases in late payment charges and increases and decreases in the Company' gross revenues.
 - b. Provide the workpapers, data, analyses and studies relied upon to assess the relationship between increases or decreases in late payment charges billed to non-residential customers and increases and decreases in the Company's gross revenues for non-residential customers.
 - c. Provide the workpapers, data, analyses and studies relied upon to assess the relationship between increases or decreases in late payment charges billed to transportation service customers and increases and decreases in the Company's gross revenues for transportation service customers.
 - d. Provide the workpapers, data, analyses and studies relied upon to assess the relationship between increases or decreases in late payment charges billed to transportation service customers and increases and decreases in the Company's gross revenues for transportation service customers.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The Company has not performed any such studies, but is relying upon the tariff language that applies the late payment charge factors to total customer bills and as such the fees vary along with variability in customer bills. Those bills reflect variations in revenues.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-20

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 32, lines 17-18, please:
- a. Provide the number of Late Payment Charges assessed by month:
 - 1. For the test year
 - 2. For the three fiscal years immediately preceding the test year.
 - b. Provide the numbers of customers by rate classification that were assessed late payment charges by month:
 - 1. For the test year
 - 2. For the three fiscal years immediately preceding the test year.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The amount of Late Payment Charges and the number of customers that were assessed late payment charges by month for the Period November 2011 through September 2015 is displayed in the attached file labeled "AOBA 10-20 attachment1.xlsx".

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

Period	Residential Htg / CLG		DC Res Non Htg - IMA	
	Number of Late Payments / a	Late Payment Amounts(\$) / a	Number of Late Payments	Late Payment Amounts(\$)
Fiscal Year 2012	120,732	\$ 356,793	8,774	\$ 9,321
Dec-2011	12,387	\$ 35,648	1,030	\$ 967
Jan-2012	12,828	\$ 35,776	1,003	\$ 983
Feb-2012	11,843	\$ 34,107	864	\$ 833
Mar-2012	12,443	\$ 37,546	915	\$ 843
Apr-2012	12,103	\$ 34,594	904	\$ 839
May-2012	11,143	\$ 32,408	891	\$ 848
Jun-2012	11,677	\$ 37,786	801	\$ 1,176
Jul-2012	12,064	\$ 37,580	797	\$ 986
Aug-2012	12,253	\$ 36,986	779	\$ 934
Sep-2012	11,991	\$ 34,361	790	\$ 912
Fiscal Year 2013	136,443	\$ 418,868	8,617	\$ 8,458
Oct-2012	12,062	\$ 34,400	805	\$ 883
Nov-2012	11,113	\$ 30,965	785	\$ 860
Dec-2012	11,775	\$ 29,908	714	\$ 739
Jan-2013	10,946	\$ 28,987	713	\$ 751
Feb-2013	10,594	\$ 31,209	664	\$ 692
Mar-2013	11,184	\$ 32,805	662	\$ 697
Apr-2013	11,854	\$ 37,303	696	\$ 767
May-2013	10,703	\$ 37,327	709	\$ 644
Jun-2013	10,915	\$ 38,887	713	\$ 616
Jul-2013	11,771	\$ 39,339	724	\$ 592
Aug-2013	11,957	\$ 39,074	724	\$ 621
Sep-2013	11,569	\$ 38,665	708	\$ 595
Fiscal Year 2014	143,629	\$ 548,017	8,721	\$ 11,216
Oct-2013	12,860	\$ 39,736	743	\$ 648
Nov-2013	11,880	\$ 36,512	740	\$ 687
Dec-2013	12,254	\$ 35,659	730	\$ 666
Jan-2014	12,296	\$ 37,806	709	\$ 706
Feb-2014	11,750	\$ 40,915	691	\$ 851
Mar-2014	10,727	\$ 42,733	677	\$ 974
Apr-2014	11,940	\$ 50,235	726	\$ 1,138
May-2014	11,351	\$ 51,285	718	\$ 1,129
Jun-2014	12,138	\$ 53,936	726	\$ 1,129
Jul-2014	12,147	\$ 52,917	710	\$ 1,120
Aug-2014	12,022	\$ 53,142	773	\$ 1,131
Sep-2014	12,264	\$ 53,142	778	\$ 1,037
Fiscal Year 2015	140,976	\$ 582,132	8,439	\$ 11,802
Oct-2014	12,326	\$ 54,298	727	\$ 1,007
Nov-2014	11,162	\$ 44,560	680	\$ 832
Dec-2014	11,701	\$ 45,330	712	\$ 907
Jan-2015	11,666	\$ 47,494	681	\$ 860
Feb-2015	11,020	\$ 44,432	699	\$ 978
Mar-2015	10,925	\$ 49,239	698	\$ 1,085
Apr-2015	12,030	\$ 51,967	703	\$ 1,109
May-2015	11,428	\$ 47,548	652	\$ 1,016
Jun-2015	12,031	\$ 52,053	676	\$ 1,035
Jul-2015	12,172	\$ 50,998	719	\$ 1,049
Aug-2015	12,267	\$ 49,318	732	\$ 999
Sep-2015	12,248	\$ 49,894	760	\$ 926

Period	DC Res Non Htg - OTH		DC C&I Htg / HC	
	Number of Late Payments	Late Payment Amounts(\$)	Number of Late Payments	Late Payment Amounts(\$)
Fiscal Year 2012	2,292	\$ 2,721	3,335	\$ 188,171
Dec-2011	251	\$ 244	346	\$ 14,620
Jan-2011	240	\$ 270	332	\$ 17,129
Feb-2012	236	\$ 240	333	\$ 7,513
Mar-2012	236	\$ 269	353	\$ 16,866
Apr-2012	225	\$ 283	377	\$ 18,565
May-2012	225	\$ 275	327	\$ 17,352
Jun-2012	220	\$ 293	316	\$ 24,058
Jul-2012	224	\$ 291	320	\$ 24,397
Aug-2012	230	\$ 320	323	\$ 23,883
Sep-2012	205	\$ 237	308	\$ 23,787
Fiscal Year 2013	2,513	\$ 3,193	3,622	\$ 337,145
Oct-2012	203	\$ 209	349	\$ 24,062
Nov-2012	201	\$ 205	343	\$ 27,831
Dec-2012	203	\$ 221	300	\$ 27,037
Jan-2013	210	\$ 218	302	\$ 28,405
Feb-2013	203	\$ 250	288	\$ 27,982
Mar-2013	212	\$ 269	273	\$ 29,802
Apr-2013	212	\$ 278	273	\$ 30,131
May-2013	213	\$ 316	287	\$ 30,522
Jun-2013	209	\$ 299	293	\$ 28,932
Jul-2013	213	\$ 276	291	\$ 29,331
Aug-2013	223	\$ 328	300	\$ 26,817
Sep-2013	211	\$ 323	323	\$ 26,292
Fiscal Year 2014	2,645	\$ 4,595	3,927	\$ 265,097
Oct-2013	226	\$ 317	366	\$ 25,857
Nov-2013	215	\$ 269	290	\$ 25,672
Dec-2013	213	\$ 291	325	\$ 31,364
Jan-2014	219	\$ 334	303	\$ 28,777
Feb-2014	205	\$ 329	325	\$ 32,963
Mar-2014	217	\$ 358	306	\$ 36,397
Apr-2014	228	\$ 419	330	\$ 8,456
May-2014	217	\$ 421	313	\$ 8,082
Jun-2014	219	\$ 436	365	\$ 10,234
Jul-2014	237	\$ 472	334	\$ 20,767
Aug-2014	224	\$ 474	324	\$ 18,609
Sep-2014	225	\$ 476	346	\$ 17,918
Fiscal Year 2015	2,553	\$ 5,254	3,690	\$ 129,037
Oct-2014	221	\$ 423	358	\$ 31,953
Nov-2014	188	\$ 227	301	\$ 5,089
Dec-2014	214	\$ 278	307	\$ 5,663
Jan-2015	196	\$ 529	303	\$ 9,166
Feb-2015	195	\$ 529	310	\$ 12,154
Mar-2015	217	\$ 621	305	\$ 12,755
Apr-2015	233	\$ 654	311	\$ 14,441
May-2015	209	\$ 465	299	\$ 9,460
Jun-2015	228	\$ 468	308	\$ 8,118
Jul-2015	219	\$ 370	298	\$ 7,520
Aug-2015	219	\$ 341	285	\$ 6,178
Sep-2015	214	\$ 348	305	\$ 6,541

Period	DC C&I Non Htg		DC GMA Htg / HC	
	Number of Late Payments	Late Payment Amounts(\$)	Number of Late Payments	Late Payment Amounts(\$)
Fiscal Year 2012	781 \$	8,820	1,456 \$	73,644
Dec-2011	83 \$	1,001	143 \$	5,982
Jan-2011	77 \$	1,071	148 \$	7,459
Feb-2012	68 \$	895	137 \$	4,861
Mar-2012	72 \$	849	144 \$	6,242
Apr-2012	94 \$	922	150 \$	8,714
May-2012	64 \$	739	148 \$	7,475
Jun-2012	80 \$	867	148 \$	8,564
Jul-2012	70 \$	769	155 \$	8,496
Aug-2012	88 \$	939	143 \$	8,536
Sep-2012	85 \$	768	140 \$	7,317
Fiscal Year 2013	1,106 \$	9,015	1,891 \$	46,270
Oct-2012	82 \$	780	140 \$	3,199
Nov-2012	107 \$	873	159 \$	3,428
Dec-2012	89 \$	655	158 \$	3,855
Jan-2013	84 \$	721	165 \$	3,872
Feb-2013	98 \$	924	160 \$	5,373
Mar-2013	109 \$	775	157 \$	4,034
Apr-2013	100 \$	960	162 \$	3,963
May-2013	97 \$	956	159 \$	4,136
Jun-2013	83 \$	897	164 \$	3,770
Jul-2013	89 \$	460	162 \$	3,358
Aug-2013	91 \$	513	157 \$	3,667
Sep-2013	77 \$	501	148 \$	3,616
Fiscal Year 2014	1,264 \$	10,405	1,624 \$	44,961
Oct-2013	100 \$	554	147 \$	2,499
Nov-2013	94 \$	503	142 \$	2,700
Dec-2013	96 \$	576	150 \$	3,458
Jan-2014	96 \$	559	146 \$	3,858
Feb-2014	123 \$	770	145 \$	5,668
Mar-2014	109 \$	1,058	127 \$	3,843
Apr-2014	112 \$	1,129	146 \$	4,581
May-2014	105 \$	1,037	129 \$	3,864
Jun-2014	115 \$	1,100	129 \$	5,970
Jul-2014	106 \$	1,123	127 \$	3,104
Aug-2014	106 \$	1,006	119 \$	2,734
Sep-2014	102 \$	991	117 \$	2,682
Fiscal Year 2015	1,007 \$	12,429	1,287 \$	33,306
Oct-2014	71 \$	809	121 \$	1,952
Nov-2014	80 \$	582	114 \$	1,713
Dec-2014	89 \$	749	118 \$	3,058
Jan-2015	86 \$	1,018	117 \$	2,934
Feb-2015	86 \$	977	101 \$	3,003
Mar-2015	85 \$	1,056	107 \$	4,068
Apr-2015	78 \$	991	117 \$	4,536
May-2015	74 \$	1,133	96 \$	2,571
Jun-2015	90 \$	1,417	99 \$	2,141
Jul-2015	78 \$	674	92 \$	1,615
Aug-2015	93 \$	1,965	104 \$	1,515
Sep-2015	97 \$	1,057	101 \$	4,199

Period	DC GMA Non Htg		DC Interruptible	
	Number of Late Payments	Late Payment Amounts(\$)	Number of Late Payments	Late Payment Amounts(\$)
Fiscal Year 2012	395	8,897	50	39,987
Dec-2011	46	1,030	4	2,779
Jan-2011	38	876	6	10,000
Feb-2012	45	638	4	3,236
Mar-2012	43	1,019	4	2,852
Apr-2012	45	1,042	7	7,316
May-2012	33	796	6	5,432
Jun-2012	39	792	6	4,461
Jul-2012	33	889	4	603
Aug-2012	35	1,069	5	2,550
Sep-2012	38	747	4	759
Fiscal Year 2013	542	14,482	203	106,558
Oct-2012	42	782	4	870
Nov-2012	44	830	5	3,577
Dec-2012	46	989	5	5,983
Jan-2013	44	1,295	5	2,029
Feb-2013	45	975	4	2,319
Mar-2013	53	1,351	27	15,228
Apr-2013	53	1,236	30	13,428
May-2013	53	1,276	26	16,287
Jun-2013	46	1,493	27	11,272
Jul-2013	37	1,532	25	13,107
Aug-2013	40	1,343	23	11,186
Sep-2013	39	1,382	22	11,272
Fiscal Year 2014	463	11,115	152	106,947
Oct-2013	56	1,163	17	8,487
Nov-2013	38	1,025	17	8,586
Dec-2013	40	827	14	8,385
Jan-2014	41	767	13	8,220
Feb-2014	42	862	15	8,635
Mar-2014	37	676	15	10,545
Apr-2014	39	847	16	19,733
May-2014	36	871	8	16,213
Jun-2014	36	929	8	3,269
Jul-2014	36	1,009	11	4,999
Aug-2014	32	1,066	9	4,898
Sep-2014	30	1,073	9	4,978
Fiscal Year 2015	440	10,910	175	133,287
Oct-2014	39	628	7	4,879
Nov-2014	31	656	5	6,651
Dec-2014	33	689	21	10,454
Jan-2015	38	971	19	6,178
Feb-2015	35	973	18	6,758
Mar-2015	31	1,036	15	6,242
Apr-2015	42	1,242	15	16,329
May-2015	33	1,152	14	26,568
Jun-2015	43	1,152	14	8,906
Jul-2015	39	1,022	14	13,813
Aug-2015	39	992	17	11,243
Sep-2015	37	397	16	15,267

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-21

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 32, lines 17-18, please:
- a. Provide the number of customers that were assessed a **second** Late Payment Charge for being more than 50 days in arrears in the payment of a monthly bill:
 - 1. In each month of the test year
 - 2. In each month of the three fiscal years immediately preceding the test year.
 - b. Provide the number of customers by rate classification by month that were assessed a **second** Late Payment Charge for being more than 50 days in arrears in the payment of a monthly bill:
 - 1. For the test year
 - 2. For the three fiscal years immediately preceding the test year.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** Information regarding the number of customers that were assessed a **second** late payment charge for being more than 50 days in arrears is not available in the Company's current legacy system.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-23

- Q.** Re: Direct Testimony of witness Tuoriniemi at page 34, lines , 1-9, and Exhibit WG (D)-4, Pages 21 of 67 and 22 of 67, please:
- a. Provide full documentation of the Company's derivation of the data by rate class shown on pages 21 of 67 and 22 of 67 in Exhibit WG (D)-4;
 - b. Provide the line labels for the amounts on each line on pages 21 of 67 and 22 of 67 in Exhibit WG (D)-4.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. The Company derives the transportation revenues from the Company's accounting system. The information contains data for the twelve month period ending September 2015.
 - b. Please see attached workbook labeled "AOBA 10-23 Attachment 1.xlsx" for line label descriptions for the amounts on each line on pages 21 of 67 and 22 of 67 in Exhibit WG (D)-4.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

Washington Gas Light Company
 Transportation Revenues
 Allocated on Normal Weather Therm Sales
 Twelve Months Ended September 2015 - Average

Description	Account Description	Reference			DC	MD	VA	FERC	
		A	B	C					
Residential Customers		Sc-Po-Ln	Allocat	Ferc Account	WG	DC	MD	VA	FERC
					D	E	F	G	H
Res W/Trms-Cool-Cool/Heat-MD	489122								
Res w/o Trms-Heating-DC	489151				9,432,516				
Res W/O Trms-Heating-MD	489152				45,983,762				
Res-Aes w/o Trms-Heat-Va	489153				21,296,281			21,296,281	
Rev-Cool&Heat-DC	489156				4,596				
Res W/O Trms-Cool-Cool/Heat-MD	489152				10,290		10,290		
Rev-Cool or Cool&Heat-Va	489153				1,661			1,661	
Nonheat&Noncool-Apts-DC	489171				50,465				
Res W/O Trms-Nonht/Cool-Apt-MD	489172				22,938		22,938		
Nonheat&Noncool-Apts-Va	489173				5,056				5,056
Nonheat&Noncool-Other-DC	489181				192,119				
Res W/O Trms-Nonht/Cool-OTH-MD	489182				148,983		148,983		
Nonheat&Noncool-Other-Va	489183				63,183				63,183
Total residential					77,211,849		46,165,973		21,366,181
Commercial and Industrial Customers									
Com & Ind Sale-Interrupt-Peeco	489012				37,000		37,000		
Com-Interp-Panda Cogeneration	489013				516,263		516,263		
CAI-Other Than GMA-Heating-DC	489111				23,242,389		23,242,389		
OTH Thn Grp Mtr Apts-Heat-MD	489112				43,422,477		43,422,477		
CAI-Heating-Va	489113				16,667,795			16,667,795	
Inactive-Sm Legacy FRS System	489121				79,191				
OTH Thn GMA-Cool/Heat-MD	489122				52,187		52,187		
Cool or Cool&Heat-Va	489123				29,216				29,216
OTH Thn GMA-Noncool/Heat-DC	489131				4,724,461				
OTH Thn GMA-Noncool/Heat-MD	489132				2,482,828		2,482,828		
Noncool & Nonheat-Va	489133				1,549,663				1,549,663
Large CAI Delivery VA	489303				3,495,929				3,495,929
Total Commercial and Industrial					96,309,399		46,520,756		21,742,602
Group Metered Apts Customers									
Grp Mtr Apts-Heating-DC	489141				9,834,697		9,834,697		
Grp Mtr Apts-Heating-MD	489142				11,278,985		11,278,985		
Grp Mtr Apts-Heat-Va	489143				5,259,072			5,259,072	
GMA - Cool/Cool & Heat - DC	489151						15,830		
GMA-Cool-Cool & Heat-MD	489152						15,830		
RevTRCGMACoolVA	489153				4,808				4,808
Interrupt-Cool-Cool & Heat-DC	489161				1,279,697		1,279,697		
GMA-Noncool & Nonheat-MD	489182				1,980,960			1,980,960	
GMA-Noncool&Nonheat-Va	489183				1,386,388				1,386,388
Large GMA Delivery VA	489413				539,059				539,059
Total Group Metered Apts.					31,878,496		13,276,775		7,186,327
Interruptible									
Interrupt-Heating-DC	489171				16,740,095		16,740,095		
Interrupt-Heating-MD	489172				19,986,510		19,986,510		
Interrupt-Heating-Va	489173				4,571,382			4,571,382	
Interrupt-Cool-Cool/Heat-DC	489181				2,911,931		2,911,931		
Interrupt-Cool-Cool/Heat-MD	489182				1,883,916		1,883,916		
Interrupt-Cool-Cool/Heat-Va	489183				60,468			60,468	
Intprl-Noncool-Noncool/Heat-DC	489191				3,824,834				
Intprl-Noncool-Noncool/Heat-MD	489192				510,743		510,743		
Intprl-Noncool-Noncool/Heat-Va	489193				1,817,367				1,817,367
Rev-Transp Of Gas Of Others-Va	489203								
Transp of Gas-Mountain-WVA	489205				460,595				460,595
Total Interruptible					52,767,940		23,476,860		6,449,216
Total Transportation Themes					257,865,683		126,343,672		56,744,326

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-24

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 36, lines 16-18, please:
- a.** Provide the workpapers, data, analyses and studies upon which the witness relies to support his assertion that "the factor that has the single greatest impact on the company's level of uncollectible expenses is the level of revenues billed in any given year."
 - b.** Specify the measure of "revenue billed" that the Company uses to assess the relationship between "billed revenue" and uncollectible gas accounts expense.
 - c.** For the test year and each of the Company's five immediately preceding fiscal years, provide:
 - 1.** The Company's actual level of uncollectible gas accounts expense for the District of Columbia;
 - 2.** The Company's level of billed revenue for the District of Columbia
 - i.** With gas cost revenues included
 - ii.** For Distribution Service without gas cost revenues

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** (a) The statement is based on Company Witness Tuoriniemi's knowledge and experience.

- (b) The level of revenue billed reflects distribution revenues, gas cost recoveries, taxes and other fees and surcharges fees included in customers' bills
- (c) Please see the attachment for further detail regarding the actual uncollectible gas accounts expense and billed revenue amounts requested.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

Washington Gas Light Company
 Uncollectible Expense and Billed Revenue Amounts
 Fiscal Years 2010-2015

	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015
DC Uncollectible Gas Accounts Expense	\$ 3,760,722	\$ 4,067,835	\$ 9,229,316	\$ 2,721,244	\$ 7,631,339	\$ 4,692,390
DC Billed Revenue with Gas Cost Revenues Included	\$ 205,207,755	\$ 173,145,964	\$ 131,314,392	\$ 157,137,725	\$ 181,603,879	\$ 168,345,015
DC Billed Revenue for Distribution Service without Gas Cost Revenues	\$ 62,989,011	\$ 65,133,759	\$ 56,054,348	\$ 64,432,829	\$ 73,489,918	\$ 72,316,990

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-27

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 49, lines 13-16, please:
- a. Verify that it is the Company's intent to close out the PRA rider at the conclusion of this proceeding;
 - b. Verify that to complete its project for the Replacement or Encapsulation of Mechanically Coupled Pipe, the Company expects to incur costs in excess of the \$28 million cap on such costs imposed by the DCPSC.
 - c. Explain how the Company plans to treat costs for completion of its project for the Replacement or Encapsulation of Mechanically Coupled Pipe that exceed the Commission's \$28.0 million cap.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- (a) It is the Company's intent to discontinue the PRA rider when the \$28 million amount included therein is reflected in the base rates approved in this case.
 - (b) The Company anticipates incurring costs in excess of the negotiated \$28 million cap.
 - (c) Any costs incurred in excess of the \$28 million will be treated as normal replacement capital expenditures and reflected in the rate base subject to review in the Company's next base rate case.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-28

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 50, lines 12-13, please:
- a. Provide the workpapers, data, and analyses relied upon to conclude that "the maximum allowed \$28.0 million" for Mechanically Coupled Pipe had been reached at September 30, 2015;
 - b. Provide the amount of expenditures for Mechanically Coupled Pipe in excess of "the maximum allowed \$28.0 million" for Mechanically Coupled Pipe as of September 30, 2015.
 - c. Explain the Company's proposed rate treatment of dollar amounts for expenditures for Mechanically Coupled Pipe in excess of the maximum allowed \$28.0 million."

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- (a) Please refer to Attachment A Workpapers included in the Supplemental Information Pursuant to the District of Columbia Public Service Commission's Rules Governing Utility Rate Cases Adjustment 24 Additional Gas Plant in Service, pages 7 to 9 of 9.
 - (b) At September 30, 2015, the Company had incurred \$3.3 million over and above the \$28 million cap. This amount was included in construction work in progress at September 2015 and was removed from the cost of service as part of Adjustment 24 Additional Gas Plant in Service,
 - (c) Please refer to the Company's response to AOBA Data Request 10-27.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-32

- Q.** Re: the Direct Testimony of witness Tuoriniemi at page 57, line 18, through page 58, line 7, please:
- a. Provide the workpapers, data, analyses, assumptions, and studies upon which the Company relies to justify its proposal to amortize BPO 2.0 transition costs over a 5-year period;
 - b. Identify the start date and the end date of the 5-year amortization period that WG proposes for transition costs.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- (a) The Company recommended the 5-year amortization period to match the anticipated contract term and to match the costs and anticipated savings consistent with the approach accepted by the Commission in Formal Case No. 1093.
 - (b) Please refer to the Attachment A Workpapers included in the Supplemental Information Pursuant to the District of Columbia Public Service Commission's Rules Governing Utility Rate Cases Adjustment 30, BPO 2.0 pages 9 and 10 of 11. The last 6 lines of page 9 show the amortization periods proposed are based on the corresponding anticipated contract terms. The totals are shown at the top of page 10 of 11.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-36

- Q.** Re: the witness Tuoriniemi's Exhibit WG (D)-1, Adjustment 6D, please document the Company's determination of net Asset Optimization revenue by month for the Company's District of Columbia jurisdictional service and the sharing of net Asset Optimization revenue between the Company and District of Columbia ratepayers for each month of the Company's last three fiscal years and for its current fiscal year to date.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** Please see the response to AOBA DR 10-7 for the asset optimization net revenue by month for the Company's District of Columbia jurisdictional service. Further, please see the attachment for the sharing amounts of asset optimization revenue for the District of Columbia for the period requested. The per book information contains both realized and unrealized Asset Optimization revenues and sharing. Actual sharing with customers is based on realized amounts only.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

Washington Gas Light Company
 DC Sharing of AO Revenues

Period		DC Sharing Amount
Oct-2011	\$	(11,697)
Nov-2011		332,260
Dec-2011		1,211,942
Jan-2012		808,361
Feb-2012		760,371
Mar-2012		74,885
Apr-2012		(731,942)
May-2012		686,112
Jun-2012		469,960
Jul-2012		1,003,772
Aug-2012		918,008
Sep-2012		351,120
	\$	<u>5,873,153</u>
Oct-2012	\$	(13,832)
Nov-2012		(1,307,289)
Dec-2012		249,557
Jan-2013		1,230,753
Feb-2013		(497,832)
Mar-2013		(1,186,282)
Apr-2013		(711,225)
May-2013		573,775
Jun-2013		(276,815)
Jul-2013		(7,270,948)
Aug-2013		(1,591,152)
Sep-2013		4,016,736
	\$	<u>(6,784,554)</u>
Oct-2013	\$	(5,244,241)
Nov-2013		(7,663,854)
Dec-2013		8,766,708
Jan-2014		(16,331,511)
Feb-2014		4,974,032
Mar-2014		1,067,419
Apr-2014		(1,195,416)
May-2014		2,267,050
Jun-2014		(718,951)
Jul-2014		8,181,310
Aug-2014		1,323,852
Sep-2014		(1,150,136)
	\$	<u>(5,723,738)</u>

Washington Gas Light Company
 DC Sharing of AO Revenues

Period		DC Sharing Amount
Oct-2014	\$	2,297,651
Nov-2014		545,414
Dec-2014		2,911,521
Jan-2015		1,498,877
Feb-2015		(2,655,142)
Mar-2015		(1,292,125)
Apr-2015		(1,589,482)
May-2015		534,100
Jun-2015		982,646
Jul-2015		162,773
Aug-2015		580,342
Sep-2015		1,657,308
	\$	<u>5,633,883</u>
Oct-2015	\$	539,209
Nov-2015		2,385,035
Dec-2015		1,442,984
Jan-2016		2,469,082
Feb-2016		1,466,036
Mar-2016		(124,760)
	\$	<u>8,177,585</u>

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-39

- Q. Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:**
- a. For each month since the inception of the Company's fee free credit/debit card bill payment program, document the numbers of District of Columbia customers by rate classification that have utilized of that program.**
 - b. For each month since inception of the Company's fee-free credit/debit card bill payment program, document the charges paid by Washington Gas for processing of bill payments for District of Columbia customers by the Company's chosen third-party credit/debit card payment processing firm.**
 - c. For each month since inception of the Company's fee-free credit/debit card bill payment program, document the payment processing costs that Washington Gas has avoided as a result of its implementation of that program.**
 - d. For each month since inception of the Company's fee-free credit/debit card bill payment program, document any costs other than payment processing costs that Washington Gas has avoided as a result of its implementation of that program.**

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. The Company's vendor only provides aggregate data. Currently, there is no way to determine the number of customers by rate classification that used the Fee Free Credit/Debit Card Payment program.**
 - b. The Company's vendor only provides aggregate data. Currently, there is no way to determine the processing charges paid for processing of bill payments.**

- c. No payment processing costs are avoided using the Fee Free Credit/Debit Card Program for District customers. As incoming payment data from the Company's third-party provider is electronic, the daily costs remain relatively static regardless of the number of payments processed. In fact, the Company has incurred a \$1.52 cost per transaction for each payment made by District customers.
- d. There are no other tangible costs that have been avoided as a result of the program.

SPONSOR: Peter Sluder
Specialist – Revenue Management

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-40

- Q.** Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:
- a. Document any changes in the charges applicable to Washington Gas for payment processing under the Fee Free Credit/Debit Card Bill Payment Program since the conclusion of Formal Case No. 1093;
 - b. Document any changes in the terms and conditions under which third-party processing services for Fee Free Credit/Debit Card Bill Payments are obtained by Washington Gas that have been implemented since the conclusion of Formal Case No. 1093.
 - c. Document any changes in entity that has been contracted to provide third-party payment processing services for Fee Free Credit/Debit Card Bill Payments for Washington Gas since the conclusion of Formal Case No. 1093.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. Washington Gas has incurred a \$1.52 cost for processing each credit/debit card transaction processed for DC customers.
 - b. The only change in the terms and conditions has been that the Company's third party provider is not charging the customer a \$4.55 fee directly and Washington Gas is paying the \$1.52 cost for processing credit/debit card payments for DC customers.
 - c. There have been no changes in entity with the third party provider since the conclusion of Formal Case No. 1093.

**SPONSOR: Peter Sluder
Specialist – Revenue Management**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-41

- Q.** Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:
- a. Provide the Company's most recent forecasts of the costs and savings associated with the Company's Fee Free Credit/Debit Card Bill Payment Program for the District of Columbia.
 - b. Provide the Company's projections of the numbers of customers by rate class in the District of Columbia that Washington Gas anticipates will elect to use the Company's Fee Free Credit/Debit Card Bill Payment Program by month:
 1. During the Company's current fiscal year;
 2. During each future year for which forecasts or estimates of customer participation in that program have been developed.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. There has been no forecast of costs and savings performed relative to the Fee Free Credit/Debit Card Bill Payment Program for the District of Columbia.
 - b. The Company does not determine how any individual customer has or will make any individual payment to the Company other than those customers who are required to make payments by cash or certified funds due to previous collection actions. There are too many external factors, such as the state of the economy, credit card interest rates, etc., that make forecasting the exact number of customers by rate classification that will opt to pay using a credit/debit card impossible. Therefore, no projections have been done.

SPONSOR: Peter Sluder
Specialist – Revenue Management

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-42

- Q. Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:**
- a. Provide the number of customers by rate classification in the District of Columbia by month since the inception of the Fee Free Credit/Debit Card Bill Payment that have used Fee Free Credit/Debit Card Bill Payments in lieu of cash payments;**
 - b. Provide the Company's assessment of the actual impacts of the Fee Free Credit/Debit Card Bill Payment Program on the number of in-person payments processed by the Company for District of Columbia customers.**
 - c. Provide the Company's assessment of the actual impacts of the Fee Free Credit/Debit Card Bill Payment Program on collection costs by rate class for District of Columbia customers.**

WASHINGTON GAS'S RESPONSE

05/23/2016

- A. The Company's vendor only provides aggregate data. Currently, there is no way to determine if any customers used the fee free credit/debit card bill payment option in lieu of paying cash, any impact of customers using the fee free credit/debit card bill payment option on the number of in-person payments and any impact of customers using the fee free credit/debit card bill payment option on collections costs.**

**SPONSOR: Peter Sluder
Specialist – Revenue Management**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-43

- Q.** Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:
- a. Identify each type of bill payment processed by or for the Company for its District of Columbia customers during the test year for this proceeding;
 - b. Provide the Company's actual annual average cost per payment processed for each type of payment processed by or for the Company during the test year.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The Company's vendor only provides aggregate data. Currently, there is no way to identify each type of bill payment processed by or for the Company during the test year and the actual annual average cost per payment processed for each type of payment processed during the test year.

**SPONSOR: Peter Sluder
Specialist – Revenue Management**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-44

- Q.** Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please:
- a. Provide by month for each month since the inception of the Fee Free Credit/Debit Card Bill Payment Program the numbers of customers in the District of Columbia in each rate classification that have received e-bills.
 - b. Provide the percentage of customers who have used credit/debit card payments in each month since the inception of the Fee Free Credit/Debit Card Bill Payment Program that also received an e-bill for the month that was paid using the credit/debit card payment option.
 - c. For each month since the inception of the Fee Free Credit/Debit Card Bill Payment Program, provide the percentage of customers who have NOT used credit/debit card payments but received an e-bill.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** Because the Company's vendor only provides aggregate data, there is no way to identify the number of customers receiving an e-bill since the inception of the program. The same principle applies regarding identifying the percentage of customers receiving e-bills who paid with a credit/debit card and the percentage of customers receiving an e-bill who did not pay with a credit/debit card.

**SPONSOR: Peter Sluder
Specialist – Revenue Management**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-45

- Q.** Re: the Company's Fee Free Credit/Debit Card Bill Payment Program, please provide for the test year and for each of the Company's three immediately preceding fiscal years:
- a.** The total number of District of Columbia customers by rate classification who made bill payments to avoid disconnection;
 - b.** The number of District of Columbia customers by rate classification who have used the fee-free credit/debit card bill payments to avoid disconnection and did not previously use credit/debit card payments for that purpose.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The Company's vendor only provides aggregate data. Currently, there is no way to identify the number of customers by rate classification who made bill payments to avoid disconnection and the number of customers who previously had not used a credit/debit card to avoid disconnection but used a credit/debit card to avoid disconnection.

**SPONSOR: Peter Sluder
Specialist – Revenue Management**

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-46

- Q.** Re: Attachment A, Workpapers, filed February 26, 2016, Adjustment No. 1D, page 10 of 29 through page 13 of 29, please:
- a. Explain why no Purchased Gas Costs are shown for Interruptible Sales Service;
 - b. Provide the Company's actual Purchased Gas Costs for Interruptible Sales Service by month for the test year;
 - c. Provide the Company's normal weather Purchased Gas Costs for Interruptible Sales Service by month for the test year;
 - d. Provide the Company's actual Purchased Gas Costs for Special Contracts by month for the test year.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. Purchased Gas costs are a pass-through to customers; therefore, they are excluded from cost of service calculations for distribution rates. The Company removed all gas costs in Adjustment 1D, as required by the Commission in Formal Case No. 1093.
 - b. Please see the attached for Interruptible gas costs for the period, as reported in the annual Actual Cost Adjustment (ACA).
 - c. The Company does not calculate gas costs for interruptible customers on a normal weather basis.
 - d. The Company has no special contract sales customers.

**SPONSOR: Robert Tuoriniemi
Chief Regulatory Accountant**

Washington Gas Light Company
District of Columbia
Interruptible Purchase Gas Costs
For the Twelve Months Ended September 2015

Oct-14	\$ 8,638
Nov-14	19,367
Dec-14	76,246
Jan-15	106,869
Feb-15	136,956
Mar-15	161,504
Apr-15	75,663
May-15	31,956
Jun-15	9,561
Jul-15	8,809
Aug-15	10,055
Sep-15	<u>4,112</u>
	<u><u>\$ 649,736</u></u>

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-48

- Q.** Re: Attachment A, Workpapers, filed February 26, 2016, Adjustment 1, page 14 of 29. Footnote a/ indicates the "Peak Month in the September 2015 NW Study is February 2015." Please:
- a. Explain how the determination was made that the Peak Month was February 2015.
 1. Was the Peak Month determined on the basis of system, jurisdictional, class, or individual customer data?
 2. Was the Peak Month determined on the basis of:
 - i. Total therms billed in the month,
 - ii. The month with the highest therms per cycle billing day
 - iii. The month with the highest therms per calendar day
 - iv. Some other measure (please specify and explain)
 - b. Provide the workpapers, data, analyses, and studies upon which the Company relies to support its determination that the Peak Month in the September 2015 NW Study is February 2015.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. The peak month was determined on a jurisdictional basis across customer classes. This was determined as the month with the highest normal weather therms attributable for the District of Columbia.
 - b. Please refer to Exhibit WG(E)-1 for further detail.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

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AOBA DATA REQUEST NO. 10

QUESTION NO. 10-49

- Q.** Re: Attachment A, Workpapers, filed February 26, 2016, Adjustment 1, page 14 of 29, please provide the witness' understanding of the relationship between the "Peak Month" terms for each C&I and GMA rate classification included in Adjustment 1, page 14 of 29, and the measures of Peak Usage used in billing Peak Usage Charges to C&I and GMA customers.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.** The amounts shown in Attachment A Workpapers included in the Supplemental Information Pursuant to the District of Columbia Public Service Commission's Rules Governing Utility Rate Cases Adjustment 1 Revenues on page 14 of 29 for the C&I and GMA rate classes represents the total throughput, adjusted to normal weather levels, for the month of February 2015, which was the month during the test year that had the greatest level of weather normalized throughput. The amount was used to estimate the level of peak usage charges (Usage X Rate) during the rate effective period. The estimate is necessary because the actual amount cannot be determined at the current time.

Peak usage charges are billed to customers pursuant to the Company's tariff, Rate Schedules 2 and 2A, as described in Exhibit WG (D) page 27, the Direct Testimony of Company Witness Tuoriniemi.

**SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant**

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
APARTMENT AND OFFICE BUILDING ASSOCIATION

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-50

- Q. Re: Attachment A, Workpapers, filed February 26, 2016, Adjustment 1, page 14 of 29, please explain why the entire "Base Gas Adjustment" is applied to usage for the month of February when the Company's Attachment A, Workpapers, Adjustment 1, pages 16 of 29 through 18 of 29, show the same Base Gas Adjustment applied to the month of January 2015.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A. Within the Normal Weather Study, the base gas adjustment is an annual adjustment recorded during the month of January which is typically the peak month. It should have been included in February. To calculate the peak usage charge, usage attributable to the actual peak month is decreased by this annual base gas adjustment.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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**WASHINGTON GAS'S RESPONSE
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APARTMENT AND OFFICE BUILDING ASSOCIATION**

AOBA DATA REQUEST NO. 10

QUESTION NO. 10-52

- Q.** Re: Attachment A, Workpapers, filed February 26, 2016, Adjustment 1, page 20 of 29, please:
- a. Explain why the Company believes it is appropriate to include Special Contracts in its analysis of DC interruptible Normal Weather therms;
 - b. Provide the workpapers, data, analyses and assumptions relied upon to assess the impact of including Special Contracts in the analysis of DC Interruptible Normal Weather therms on:
 1. The Company's estimate of "Variation per DDD" shown in Column F
 2. The Company's estimates of "Base Gas Inc. A/C" shown in Column J

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. At the time the Company's direct testimony was filed, the special contract was still pending approval before the Commission. Prior to this special contract, AOC had been an interruptible customer. Therefore, they were included the interruptible class.
 - b. No study was performed to assess the impact of including AOC in the interruptible class.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

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AOBA DATA REQUEST NO. 11

QUESTION NO. 11-6

- Q.** Re: witness Wagner's Direct Testimony Exhibit WG (M)-5 at pages 65 and 66, please provide:
- a. The Company's rationale for including the proposed RNA in the General Service Provisions and not a new schedule;
 - b. The appropriateness of including Peak Usage Charge revenues in the determination of the proposed RNA;
 - c. The Company's rationale to exclude a proposed limit on the magnitude of the proposed RNA.

WASHINGTON GAS'S RESPONSE

05/23/2016

- A.**
- a. Similar to other regulatory mechanisms, a General Service Provision ("GSP") provides details on the calculation of a regulatory mechanism. The RNA, which can result in a credit or charge to customers, should be included in the tariff as a GSP. As shown on Page 33 of Exhibit WG (M) – 5, proposed GSP No. 29 would be applicable to Rate Schedule Nos. 1, 1A, 2, 2A, 2B and 2C.
 - b. The initial step in calculating the RNA (shown on Exhibit WG (M) – 5, Page 33, III.A.1.) is to utilize the firm non-gas revenue from the latest base rate proceeding. Firm non-gas revenue would include: 1) customer charges; 2) distribution charges; and 3) peak usage charges. Therefore, peak usage charges must be included in the determination of the RNA.
 - c. Though a cap can help to limit the fluctuation in the size of the credit or charge in any month, it can also cause a delay in the actual crediting or charging of the RNA. The lack of a cap allows the crediting or charging of

any RNA amount closer to when billings caused the RNA balance to occur.

SPONSOR: James B. Wagner
Director – Rates and Regulatory Affairs

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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WASHINGTON GAS'S RESPONSE
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AOBA DATA REQUEST NO. 13

QUESTION NO. 13-5

- Q.** Re: the Supplemental Direct Testimony of witness Tuoriniemi at page 7, lines 18-21, please:
- a.** Verify that the Company's approach to the estimation of peak usage charge revenue:
1. Is based on peak month usage under the assumption that all classes subject to Peak Usage Charges experience their peak usage under normal weather conditions in the same month (i.e., the month of February 2015);
 2. Is premised on the assumption that all customers within each rate classification to which Peak Usage Charges are applicable experience their maximum billing month's usage in the same month;
 3. Is premised on a determination of "peak month usage" for each rate classification subject to Peak Usage Charges that reflects a determination of the "peak month" based on total usage for the class;
 4. Is premised on a determination of "peak month usage" for each rate classification subject to Peak Usage Charges that does not consider usage per cycle billing day:
 - i. For Individual customers within each applicable rate classification;
 - ii. For the class in total.
- b.** Verify that the Company has provided no analyses as part of either its Direct or Supplemental Direct Testimony and Exhibits in this proceeding which assesses the months in which individual customers in each rate classification subject to Peak Usage Charges have actually experienced their maximum billing month's usage;

- c. Verify that the Company has provided no analyses as part of either its Direct or Supplemental Direct Testimony and Exhibits in this proceeding which assesses the relationship between actual peak month usage for each affected rate classification and the sum of actual Peak Usage Charge billing determinants for any historic month for the same rate classification:
1. For the test year;
 2. For any other historic period.

WASHINGTON GAS'S RESPONSE

05/31/2016

- A. a. For items 1 and 2: yes, those are assumptions the Company is making for the purposes of estimating the Peak Usage Charge. For item 3, peak month is determined based on the **highest monthly throughput for all firm customers**. Normal weather usage for that month for Tariff 2 & 2A customers is then used to calculate the Peak Usage Charge. For item 4, the Company's estimation method **does not consider usage per cycle billing day**, but it doesn't need to because by virtue of algebra the billing month with the highest therm usage for a Tariff 2 & 2A customer is their maximum billing month usage **as cycle billing days are consistently 21**.
- b. The Company has not performed such an analysis by customer in its direct or supplemental testimony.
- c. The Company has not performed such an analysis in its direct or supplemental testimony.

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

Formal Case No. 1137

**WASHINGTON GAS'S RESPONSE
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AOBA DATA REQUEST NO. 13

QUESTION NO. 13-7

- Q.** Re: the Supplemental Direct Testimony of witness Tuoriniemi at page 9, lines 1-15, please:
- a.** Provide the workpapers, data, and analyses that constitute the referenced 36-month regression analysis, including all computed regression statistics for the referenced regression analysis;
 - b.** Identify the rate class to which the identified \$2,641,000 of distribution charge revenue and the 7,999,000 therms of firm usage would be attributed;
 - c.** Provide any and all adjustments to the Company's Class Cost of Service Study in this proceeding that WG assesses are necessary to reflect consideration of the approved AOC agreement, as well as the workpapers, data, analyses, studies and assumptions upon which the Company relies to support necessary adjustments to its filed Class Cost of Service Study;

WASHINGTON GAS'S RESPONSE

05/31/2016

- A.**
- a.** Please refer to the electronic version of Exhibit WG (2D)-4 provided in response to AOBA Data Request No. 1, Question No. 3.
 - b.** For Firm Delivery Service they do not pay a tariff rate, they pay a special contract rate. Therefore, their firm service class is unique to them as no other customer is similarly situated.
 - c.** No adjustments to the Class Cost of Service Study are necessary. The Class Cost of Service Study is used as the basis for determining rate design for the distribution and customer charges for firm customers paying the tariff rates that are being set in this proceeding. As the Architect of the Capitol does not pay a tariff rate, adjusting the Class Cost of Service Study in any way to

account for them in a firm service category would distort individual class results for a customer that does not pay the firm tariff rate.

Part (a) and (b)

SPONSOR: Robert E. Tuoriniemi
Chief Regulatory Accountant

Part (c)

SPONSOR James B. Wagner
Director – Rates and Regulatory Affairs

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

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**WASHINGTON GAS'S RESPONSE
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AOBA DATA REQUEST NO. 13

QUESTION NO. 13-22

- Q.** Re: the Supplemental Direct Testimony of witness Wagner at page 2, lines 15-21, please:
- a. Provide witness Wagner's understanding of the number of Competitive Service Providers who are licensed to market gas supply services to Interruptible service customers in the District of Columbia;
 - b. Detail witness Wagner's experience with respect to the negotiation of interruptible gas supply contracts with Competitive Service Providers;
 - c. Provide witness Wagner's understanding of the extent to which the terms and conditions and pricing under interruptible gas supply contracts offered by Competitive Service Providers can differ;
 - d. Provide the data, analyses, workpapers, and studies upon which the witness relies to assess differences between the prices for interruptible gas supply charged by the Company during the test year;
 - e. Provide the Company's assessment of alternative fuel prices for interruptible service customers in the District of Columbia for each month of the test year and for each month of the two immediately preceding WG Fiscal years. The response to this request should include alternative fuel price information of a monthly basis for each alternative fuel that can be used by one or more interruptible service customers in the District of Columbia.

WASHINGTON GAS'S RESPONSE

05/31/2016

- A.** a. A review of the Commission website indicates 13 CSPs currently serving commercial/interruptible customers.

- b. The witness is not involved in negotiations between interruptible customers and Competitive Service Providers ("CSPs").
- c. The witness is not involved in the pricing of gas supply contracts offered by CSPs.
- d. Page 2, lines 15-21 does not discuss the assessment of price differences.
- e. The witness has not done an assessment of alternate fuel prices for interruptible customers.

Sponsor: James B. Wagner
Director – Rates and Regulatory Affairs