

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

IN THE MATTER OF THE JOINT APPLICATION FOR APPROVAL TO CHANGE AND ESTABLISH NATURAL GAS DELIVERY SERVICE RATES FOR ENERGY WEST MONTANA, INC. AND CUT BANK GAS COMPANY	UTILITY DIVISION Docket No. D2017.9.80
---	---

**ENERGY WEST MONTANA’S AND CUT BANK GAS COMPANY’S
SECOND SET OF DATA REQUESTS TO THE
MONTANA CONSUMER COUNSEL
(EWM-CBGC-002 - EWM-CBGC-010)**

Energy West Montana, Inc. (“EWM”) and Cut Bank Gas Company (“CBGC”), by and through their undersigned counsel, Holland & Hart LLP, pursuant to applicable rules of procedure and Order No. 7575, submit the attached data requests to the Montana Consumer Counsel (“MCC”).

DEFINITIONS, INSTRUCTIONS, AND RESPONSE DATE

Please see the instructions in EWM/CBGC’s first set of data requests. Please respond to these data requests by March 23, 2018.

Respectfully submitted this 9th day of March, 2018.

s/ Nikolas S. Stoffel
Nikolas S. Stoffel, #13485
Thorvald A. Nelson, #8666
Holland & Hart LLP
6380 South Fiddlers Green Circle, Suite 500
Greenwood Village, CO 80111
Telephone: (303) 290-1601, 1626, respectively
nsstoffel@hollandhart.com
tnelson@hollandhart.com

**COUNSEL FOR ENERGY WEST MONTANA,
INC. AND CUT BANK GAS COMPANY**

DATA REQUESTS

EWM-CBGC-002 RE: System Planning and Design
Witness: Donkin

Please provide copies of all documents reviewed by Mr. Donkin pertaining to the planning and design of EWM and CBGC's distribution system capacity to meet the peak load or demands of its customers.

EWM-CBGC-003 RE: System Planning and Design
Witness: Donkin

- a. Does Mr. Donkin agree that EWM's & CBGC's distribution mains must be sized to accommodate the total demand of their firm service customers at the time of the system peak? Please explain your answer.
- b. Does Mr. Donkin agree that the length of distribution main necessary to connect all customers to the system is dependent on the number of customers and location of customers on the distribution loop? Please explain your answer.
- c. Does Mr. Donkin agree that there is a minimum size pipe that EWM & CBGC use in order to provide safe and reliable service to their distribution customers? Please explain your answer.
- d. Does Mr. Donkin agree that EWM & CBGC will use their minimum size main, rather than a smaller main, if the demand on a specific distribution loop could be served from a main smaller than NWE's designed minimum size main? Please explain your answer.

EWM-CBGC-004 RE: System Planning and Design
Witness: Donkin

Does Mr. Donkin have any experience in planning or designing gas distribution systems? If yes, please provide a detailed explanation of Mr. Donkin's experience in planning and/or designing gas distribution systems.

EWM-CBGC-005 RE: System Design/Allocation of Distribution Main
Witness: Donkin

Is it Mr. Donkin's position that EWM's and CBGC's gas distribution systems are not designed to interconnect all of the utility's customers to the utility's distribution system? Please explain your answer in detail.

EWM-CBGC-006 RE: Meters and Services Costs
Witness: Donkin

Is it Mr. Donkin's position that the service connecting a single customer to the distribution system at one location of the distribution system and the meter used to measure the volumes delivered to that customer are also used to move and measure gas volumes delivered to other customers located at different locations on the system? Please explain your answer in detail.

EWM-CBGC-007 Re: Allocation of Fixed Costs
Witness: Donkin

Please confirm whether or not MCC proposes a customer charge of \$12.00 for EWM Residential Great Falls-Cascade and EWM Residential West Yellowstone customer classes as indicated on page 3 of GLD-2.

EWM-CBGC-008 Re: Capital Structure
Witness: Hill

- a. Please explain how EWM & CBGC use their long-term debt.
- b. Please explain how EWM & CBGC use their short-term debt.
- c. Please explain the rationale for including short-term debt in the capital structure used to determine Mr. Hill's rate of return for EWM & CBGC in this proceeding.
- d. By including short-term debt in the cost of debt calculation, how has Mr. Hill accounted for rising interest rates on the variable interest rate line-of-credit? Please specifically explain how the interest expense on short-term debt will be recovered if short-term debt with a variable interest rate is included in the capital structure at a fixed amount.

EWM-CBGC-009 Re: Rate of Return/Cost of Equity
Witness: Hill

- a. Please provide copies of all documents (studies, reports, articles, academic texts, etc.) that are referenced in Mr. Hill's testimony.
- b. To the extent not already provided in response to subpart (a), please provide copies of all documents (studies, reports, articles, academic texts, etc.) that Mr. Hill referred to or relied upon in preparing his testimony in this proceeding.

EWM-CBGC-010 Re: Cash Working Capital
Witness: Schulz

Please identify any commission orders accepting Mr. Schulz's cash working capital methodology.

CERTIFICATE OF SERVICE

I certify that on the 9th day of March, 2018, the **ENERGY WEST MONTANA’S AND CUT BANK GAS COMPANY’S SECOND SET OF DATA REQUESTS TO THE MONTANA CONSUMER COUNSEL (EWM-CBGC-002 THRU EWM-CBGC-010)** were filed with the Montana PSC and served via U.S. Mail and/or e-mail, unless otherwise noted, to the following:

Will Rosquist
Montana PSC
1701 Prospect Avenue
PO Box 202601
Helena, MT 59620-2601
wrosquist@mt.gov
**via UPS Overnight Mail for delivery
3-12-18**

Robert Nelson
Jason Brown
Montana Consumer Counsel
111 N. Last Chance Gulch
Suite 1B, P.O. Box 201703
Helena, MT 59601
robnelson@mt.gov
jbrown4@mt.gov

Jed Henthorne
President and General Manager
Energy West Montana, Inc.
Cut Bank Gas Company
PO Box 2229
Great Falls, MT 59403-2229
jhenthorne@egas.net

Thorvald A. Nelson
Nikolas S. Stoffel
Holland & Hart, LLP
6380 South Fiddler’s Green Circle
Suite 500
Greenwood Village, CO 80111
tnelson@hollandhart.com
nsstoffel@hollandhart.com

Kevin Degenstein
Chief Operating Officer
Chief Compliance Officer
Gas Natural Inc.
PO Box 2229
Great Falls, MT 59403-2229
kdegenstein@egas.net

For electronic service only:
aclee@hollandhart.com
ppenn@hollandhart.com
ssnow@mt.gov

s/ Adele C. Lee _____