Natural Gas: Clean, Abundant, Efficient, Domestic





American Gas Association

- A national, nonprofit, member association serving 200 investor-owned and municipal natural gas utilities
- Advocates for natural gas utilities and their customers before Congress, state legislatures, and federal and state regulatory bodies
- Delivers programs and services that enhance utility operations
- Publishes comprehensive statistical records of the natural gas industry



The US Natural Gas Industry At A Glance (2010)

	<u>Participants</u>	Miles of Pipe	Regulatory Regime
Producers	5,000 Independents 21 Majors	0	Phased price deregulation began i979; completed 1989
Pipelines	210	300,000	Federal Energy Regulatory Commission (FERC)
Gas Marketers	250	0	Unregulated
Local Utilities IOU Municipal	260 930	894,000 320,000	State Utility Commissions Local Governments
End Users	Residential 65 million Commercial 5 million Industrial 200,000 Electric Utilities 500	Consumption 5 Tcf 3 Tcf 7 Tcf	Unregulated Interstate - FERC Intrastate - State Commissions

Source: Dept. of Energy, Energy Information Administration, AGA



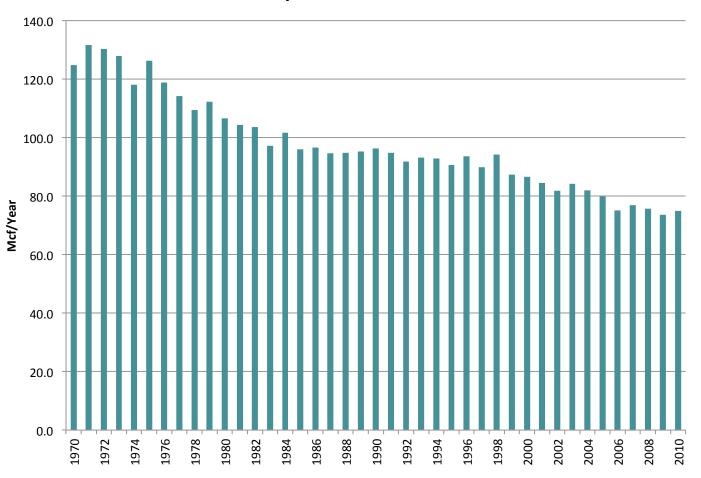
U.S. Natural Gas Customer Usage and Investment (Distribution Sector)

- 16 million new residential customers from 1980 to 2010
- \$124 billion in new construction from 1980 to 2010
- 1980 total residential consumption = 4.7 Tcf
- 2010 total residential consumption = 4.9 Tcf



Declining Use per Residential Customer

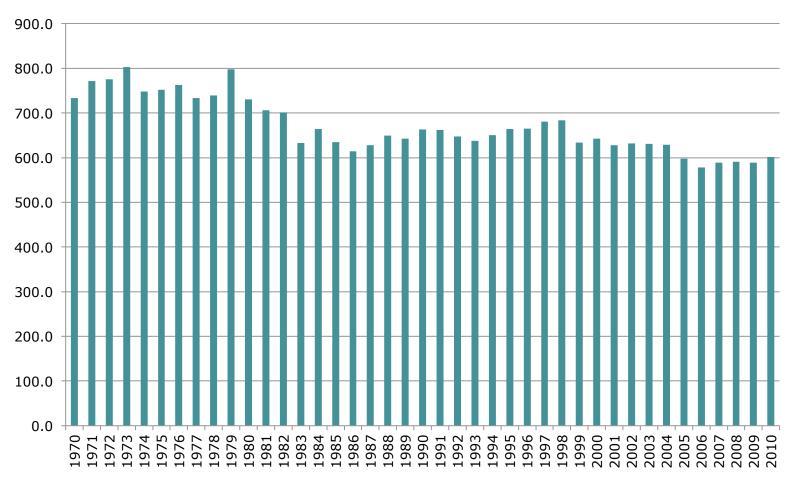
Normalized Use per Residential Gas Customer





Declining Use Per Commercial Customer

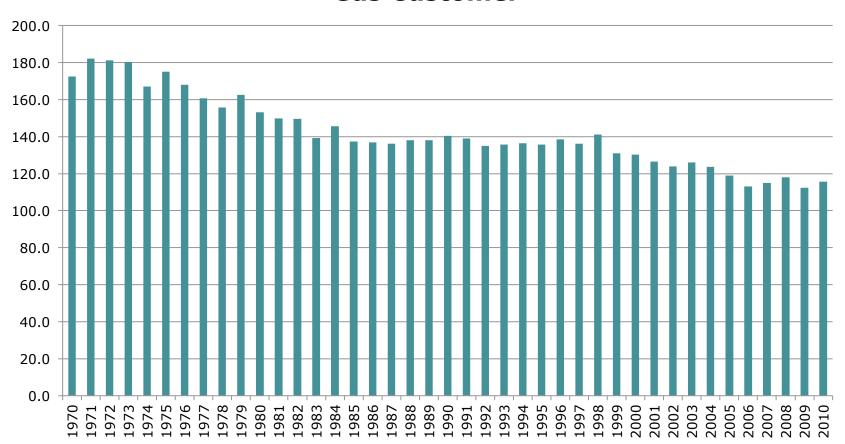
Normalized Use Per Commercial Gas Customer





Declining Use Per Residential and Commercial Customer

Normalized Use Per Residential and Commercial Gas Customer





Forecasting Needs of Natural Gas Utilities

- Forecasting is used to manage risk
- Gas load forecasting essential to setting rates
 - Short term operations and matching supplies to load
 - Mid term ratemaking, finance, construction
 - Long term long range gas supply and construction
- Disaggregate res/comm into heating and basic loads
- Use per customer critical
- Greatly dependent on weather
 - Small change has major impact on forecast load
 - Adjust use/customer to normal weather
- For different climate zones or extensive territory, may use multiple weather adjustments



The Use of HDDs in Natural Gas Ratemaking

- Virtually all utilities use heating degree day data in the ratemaking process
- Recent weather has been warmer than normal in all areas and has caused utilities expected sales volumes to be overstated in the rates
- Recent weather has been MUCH warmer in the warmer than normal years, and only SLIGHTLY colder in the few years that it has been colder than normal
- The normal distribution of 30 year HDDs no longer is a horizontal line, but an downwardly sloping line.



Traditional Volumetric Rate Design

- Volumetric each unit of gas is assigned a pro-rata share of distribution costs
- Implies distribution revenue recovery only if customers use forecasted gas volumes
 - Increasing gas commodity sales is a major objective
 - Contains a financial disincentive for aggressively promoting energy efficiency and commodity conservation



Natural Gas Ratemaking Calculation Representative Example – Average Usage

\$300,000,000 Annual Cost of Service 1,000,000 Residential Customers 3000 HDDs per customer per year 100 Mcf per customer per year

Volumetric

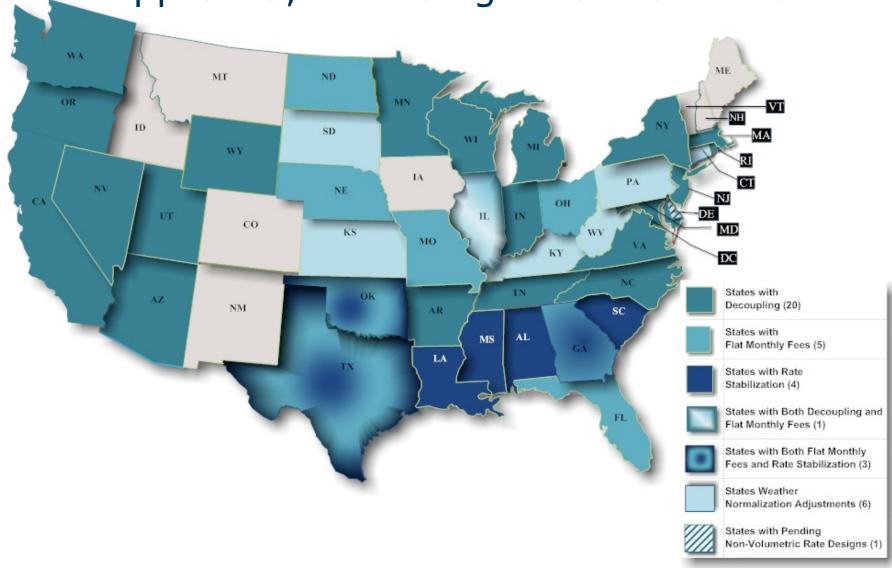
- 100,000,000 Mcf/yr Total System Throughput
- \$3 Distribution Charge/ Mcf

Non-volumetric

- 1,000,000 Residential Customers
- \$300 Distribution Charge/ customer



States with Non-Volumetric Rates and WNA 39 Approved, 1 Pending As of March 2012





Non-Volumetric and WNA Rates Remove Most Weather Impacts

Total

112 utilities in 39 states serving 50 million customers

Weather Normalization (partial decoupling)

 55 utilities (49 in 2007) in 25 states and Canada serving 16 million US customers

Revenue Decoupling

48 utilities (19 in 2007) in 21 states serving 30 million customers

Rate Stabilization Tariffs

 14 utilities (11 in 2007) in 7 states serving 6 million customers

Flat Monthly Fee and Variants

15 utilities (4 in 2007) in 9 states serving 9 million customers



Use of NOAA 30-Year Normals by Utilities

- Nearly all use NOAA data
 - Hourly, daily, or monthly
- Very few use NOAA 30-year normal
- 2012 AGA survey
 - 25 utilities, 18 states, 1 Canadian province
 - Only one utility using unadjusted 30-year normals
 - Some use own data from own data stations
 - Many use 10 year, or 15, or 20 years of data
 - Many use a rolling time period
- Utilities using expert witnesses in rate cases to show that NOAA 30-year normal is not predictive of future HDDs



Modernization of NOAA Climate Normals

- All users need data that is timely, accurate, and consistent
- All utilities want data that provides the best indicator of near-term future weather conditions
- The natural gas industry, regulators, and customers would all benefit from normals that are more representative of current climate
 - Shorter period normals, i.e., 20, 15, and 10-year periods
 - Rolling time periods
 - Annual updates of climate normals
 - Dynamic normals



Items to Consider in the Calculation of NOAA Climate Normals

- First order weather stations vs. remote locations and weather differences across a service territory
- Wet bulb versus dry bulb measurements
- Use of 24-hour data vs. max-min data
- Current HDD calculation methodology cannot be updated
- Rounding Error



