## CASE NO. GT-2010-0261

# MISSOURI GAS ENERGY COMPANY

# SUPPLEMENTAL DIRECT TESTIMONY

#### OF

## **RICHARD HAUBENSAK**

## ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

# SCHEDULE RJH 15

The Empire District Gas Company Response to Staff Data Request 0164 Case No. GR-2009-0434 Regarding Telemetry Costs

Schedules RJH 15.2 – 15.3

Staff Data Request 0164 with Empire District Response

Schedule RJH 15.1

#### **Missouri Public Service Commission**

#### Data Request

Data Request No.	0164
Company Name	Empire District Gas Company, The-Investor(Gas)
Case/Tracking No.	GR-2009-0434
Date Requested	9/25/2009
lssue	Tariff Issue - Transportation Tariffs
Requested From	Angela Cloven
Requested By	Michael Ensrud
Brief Description	Why require "up front" payment?
Description	Please explain the decision to charge those transporters, who do not have telemetry, for the telemetry equipment "up front" versus imbedding this in the proposed base rates. What would be the costs? If it varies, please explain the range in costs.
Due Date	10/12/2009
Response	Provided by Scott Keith - The proposal to make the transportation customers pay for telemetry is not a change in policy. The current tariff requires the transportation customer to pay for telemetry. See sheets 29, 32, 34 & 37 of the current natural gas tariff. Telemetry investment costs have never been included in rate base. Historically, the transportation customer has been required to pay for the investment cost.
	The cost of telemetry varies by the size of the meter. At the present time the estimated cost of the investment in telemetry would range from around \$1,070 in the case of a small volume meter installation to around \$\$2,600 in the case of a large volume meter installation.
The attached information	provided to Missouri Public Service Commission Staff in

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2009-0434 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Empire District Gas Company, The-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Empire District Gas Company, The-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Rationale Public NA

Schedule RJH 15.3