

**CASE NO. GR-2009-0355  
MISSOURI GAS ENERGY**

**SURREBUTTAL TESTIMONY**

**OF**

**RICHARD HAUBENSAK**

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

**SCHEDULE RJH 11**

Minnesota Energy Resources Corporation  
Initial Brief (Portion)  
Minnesota Public Utilities Commission  
Docket No. G-007,011/GR-08-835

Schedules RJH 11.2 – 11.4 – Cover Page and Table of Contents

Schedule RJH 11.5 – Page 55 of Initial Brief, Regarding Telemetry Costs

STATE OF MINNESOTA  
BEFORE THE  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Minnesota  
Energy Resources Corporation for Authority to  
Increase Rates for Natural Gas Service in  
Minnesota

MPUC DOCKET No. G-007,011/GR-08-835

OAH Docket No. 8-2500-19924-2

MINNESOTA ENERGY RESOURCES CORPORATION'S  
INITIAL BRIEF

MARCH 3, 2009

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Ms. Hoffman Malueg's Rebuttal Testimony, which was offered in response to Mr. Haubensak's Direct Testimony, as Mr. Haubensak acknowledges,<sup>179</sup> states: MERC is proposing to require all interruptible customers, including all of MERC's Small Volume Transportation customers, to install telemetry. This proposal makes Mr. Haubensak's statement a moot point. Currently under MERC's existing tariff, a Small Volume Transportation customer may either install telemetry or purchase the small volume balancing service."<sup>180</sup> Constellation therefore had clear notice in the record that MERC proposed to require all small volume transportation customers to install telemetry and to delete the tariff provision relating to the small volume balancing service.

With respect to telemetry, Mr. Haubensak testified that he agrees with MERC's proposal that all interruptible customers be required to install telemetry.<sup>181</sup> He also testified, however, that he did not agree with the telemetry requirement for small volume transportation customers and that there would not be a small volume program because customers could not afford it.<sup>182</sup> With respect to the relative expense of telemetry versus the small volume balancing service, Mr. Haubensak agrees that the installation of telemetry is a one-time cost and that the ongoing small volume balancing fee is a charge that would be assessed in every bill.<sup>183</sup> Under MERC's proposal, a small volume transportation customer would be required to make a one-time payment of approximately \$810.00 for the installation of telemetry equipment.<sup>184</sup> An average small

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<sup>179</sup> Tr. Vol. 2A at 64-65 (Haubensak).

<sup>180</sup> Ex. 34, Hoffman Malueg Rebuttal at 13.

<sup>181</sup> Ex. 62, Haubensak Surrebuttal at 5; Tr. Vol. 2A at 83-84 (Haubensak).

<sup>182</sup> Tr. Vol. 2A at 76-77 (Haubensak).

<sup>183</sup> Tr. Vol. 2A at 93-94 (Haubensak).

<sup>184</sup> Ex. 110, MPUC Staff Information Request No. 12.