

Exhibit No.	
Issue:	Gas Transportation
Witness:	Richard Haubensak
Sponsoring Party:	Constellation NewEnergy- Gas Division, LLC
Type of Exhibit:	Surrebuttal Testimony
Case No.:	GR-2009-0355
Date Testimony Prepared:	October 14, 2009

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

FILED²

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SURREBUTTAL TESTIMONY

**Missouri Public
Service Commission**

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISON, LLC

October 14, 2009

Constellation
Exhibit No. 86
Case No(s). GR-2009-0355
Date 10-26-09 Rptr KF

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

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1
2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Richard Haubensak. My business address is 12120
4 Port Grace Boulevard, Suite 200, LaVista, Nebraska, 68128.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am a self-employed consultant. I am testifying in this case on
7 behalf of Intervenor, Constellation NewEnergy-Gas Division, LLC
8 ("Constellation"). Constellation is a major marketer of natural gas
9 on the Missouri Gas Energy ("MGE") distribution system.

10 **Q. DID YOU PREVIOUSLY PRESENT DIRECT AND REBUTTAL TESTIMONY**
11 **IN THIS CASE?**

12 A. Yes, I did.

13 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

14 A. I wish to comment on the discussion of transportation thresholds
15 presented by MGE witness, David N. Kirkland, in his rebuttal
16 testimony (beginning on page 16), and the rebuttal testimony of
17 Donald Johnstone on behalf of MGUA in regard to his cost of
18 service study and discussion of transportation issues. I will address
19 the unfairness of MGE unilaterally calling OFO days (or OFO
20 *months*) when its pipeline has not done so and there is no system
21 operational emergency. Finally, I wish to discuss the cost of
22 telemetry equipment, if it is deemed necessary to provide
23 transportation service to small volume customers.

1 **Q. WHAT IS CONSTELLATION'S PROPOSAL IN THIS CASE CONCERNING**
2 **THE THRESHOLD FOR ELIGIBILITY FOR TRANSPORTATION**
3 **SERVICE?**

4 A. As set out in my direct testimony (on pages 3-7), Constellation
5 requests MGE's threshold be changed to allow transportation to
6 non-residential gas customers with annual usage of 30,000 Ccf per
7 year. The newly-eligible transportation customers ("small volume
8 transportation customers") would be in the Large General Service
9 (LGS) rate class. MGE currently limits transportation service only to
10 those customers "the Company expects will exceed 15,000 Ccf in
11 any one month of a 12-month billing period." The current threshold
12 only applies to large, industrial customers in MGE's LVS rate class.
13 By lowering the threshold to customers using at least 30,000 Ccf
14 per year, as I have proposed in this case, higher-volume customers
15 in the Large General Service (LGS) rate class would also qualify for
16 transportation service.

17 **Q. PLEASE ADDRESS MR. KIRKLAND'S REBUTTAL TESTIMONY.**

18 A. On page 16, beginning at line 16, of his Rebuttal Testimony, Mr.
19 Kirkland expresses the view that lowering the transportation
20 eligibility threshold would result in stranded costs to MGE. He
21 argues that "MGE's remaining customers would pay for the cost of
22 interstate transportation capacity for those customers who change
23 to transportation service."

1 **Q. IS THIS AN ACCURATE STATEMENT?**

2 A. No, it is not. The interstate pipeline capacity needed to serve
3 *existing* MGE sales customers who want to go to a transportation
4 service would be provided by MGE. MGE would be fully reimbursed
5 for the pipeline capacity that is assigned to serve *existing* MGE
6 customers who prefer to go to transportation service. If done
7 properly, MGE would be fully reimbursed for their cost of interstate
8 pipeline capacity and would be revenue neutral.

9 **Q. DO YOU HAVE AN EXAMPLE OF HOW THIS PROCESS WOULD WORK**
10 **USING THE ACTUAL TARIFF OF A LOCAL DISTRIBUTION COMPANY**
11 **(“LDC”)?**

12 A. Yes, I do. The specific language and details could vary. I have
13 attached as Schedule RJH 5 the compliance filing of MidAmerican
14 Energy, an Iowa LDC, when they filed their tariffs to implement
15 small volume transportation. The discussion of capacity release
16 starts on page 3 of MidAmerican's filing, and is also covered on
17 page WT-58 of the tariff (which appears in Schedule RJH 5, at
18 Schedule RJH 5.15).

19 **Q. WHY DID YOU CHOOSE MIDAMERICAN ENERGY FOR YOUR**
20 **EXAMPLE?**

21 A. I believe the MidAmerican example is clear and easy to
22 understand. Again, the specific language and details could vary.

1 However, if done properly, there is no reason that MGE should be
2 left with stranded costs, or stranded interstate pipeline capacity, if
3 the threshold is lowered.

4 **Q. PLEASE CONTINUE.**

5 A. Mr. Kirkland, on page 17 of his Rebuttal Testimony, states, "if the
6 threshold for transportation capacity is changed to increase the
7 number of customers transporting supplies on MGE's system, MGE
8 would have to propose a change in the balancing provisions to
9 include a daily balancing provision."

10 **Q. IS THIS AN ACCURATE STATEMENT?**

11 A. I do not believe so. Assume for the moment that telemetry
12 equipment would be required for new transportation customers,
13 although I do not believe that is necessary based on Constellation's
14 experience in other states. If telemetry equipment is deemed
15 necessary, these customers could be placed in existing
16 transportation pools which Constellation has on the MGE system,
17 or in a new pool established for these customers. I do not believe
18 there would be a need for a new balancing provision in this
19 situation.

20 **Q. WHAT OTHER ISSUES DOES MR. KIRKLAND RAISE?**

21 A. Mr. Kirkland goes on to state that "MGE is not prepared at this time
22 to make such changes, which require internal system programming

1 changes and a transition period for the installation of measurement
2 and telemetry equipment on customer premises."

3 **Q. WHAT IS YOUR OPINION OF THIS STATEMENT?**

4 A. Again, if telemetry equipment is required, these customers could go
5 into existing transportation pools or a new pool on the MGE system.
6 I agree there would have to be a transition period to install
7 telemetry equipment. If telemetry is not required, as I have
8 demonstrated is workable from Constellation's experience in other
9 states, a transition period would have to be established to set up
10 the process for making nominations for the non-telemetered
11 customers and development of a balancing service for these
12 customers to insure MGE is fully reimbursed for their costs and that
13 no additional costs are placed on the remaining sales customers.

14 **Q. PLEASE CONTINUE.**

15 A. Mr. Kirkland goes on to state that I have "not proposed a method
16 for the recovery of this cost from customers migrating to
17 transportation service or how to address the other issues noted
18 above." I believe I have explained in my testimony how costs would
19 be recovered. I would have to defer to MGE as to how much should
20 be charged for daily balancing, since they know their system better
21 than I do. One last thing I would point out is that MGE is already
22 providing the service Constellation is proposing in this case, to
23 schools in Missouri. What Constellation is proposing is not new to

1 MGE. It is merely an expansion of an existing service which MGE is
2 already providing.

3 **Q. PLEASE COMMENT ON MR. JOHNSTONE'S REBUTTAL TESTIMONY.**

4 A. I did not complete a cost of service study as done by Mr.
5 Johnstone. However, as I noted in my direct testimony, the cost to
6 serve transportation customers is usually less than the cost to
7 serve similarly situated sales customers because: (1)
8 Transportation customers provide their own gas supply, reducing
9 the LDC's working capital needs; (2) Transportation customers
10 lessen the burden of the utility's gas supply department; and (3)
11 Any bad debt expense attributable to transportation customers
12 would be much less for the utility to bear because the gas supply
13 portion of the bad debt has been provided by the marketer.

14 **Q. WHAT ABOUT MR. JOHNSTONE'S COMMENTS ON THE**
15 **TRANSPORTATION TARIFF ISSUES IN THIS CASE?**

16 A. I am in agreement with Mr. Johnstone's comments about MGE's
17 proposed changes in the transportation terms and conditions in this
18 case. As he states, on page 15, beginning on line 10, of his
19 Rebuttal Testimony: "Many of the changes would increase the
20 charges to customers where there is no cost basis for the
21 increases." As I stated in my direct testimony, at page 12, line 21 to
22 page 13, line 4: "The local distribution company should design its
23 transportation rules to 'mirror the applicable interstate pipeline to

1 insure they recover all the penalties coming from the interstate
2 pipeline from the party on their system responsible for the penalty.
3 Anything more than that, such as being allowed to call an OFO
4 when one is not being called by the interstate pipeline, means they
5 are attempting to recover from someone else a penalty that party is
6 not responsible for."

7 **Q. HAS MGE CALLED ON OFO DAY DURING THE PENDENCY OF THIS**
8 **RATE CASE?**

9 A. Actually, MGE has called two OFO *months*, not days, for the entire
10 months of September and October 2009. Copies of the OFO
11 notices issued by MGE are attached to this surrebuttal testimony as
12 Schedule RJH 6. MGE apparently believes it already has the power
13 to call an OFO day even though there is no system operational
14 emergency and the upstream interstate pipeline has not called an
15 OFO day. MGE should not be allowed to do this.

16 **Q. WHAT IS MGE'S STATED REASON FOR CALLING OFO DAYS**
17 **(ISSUING OPERATIONAL FLOW ORDERS) FOR THE ENTIRE MONTHS**
18 **OF SEPTEMBER AND OCTOBER?**

19 A. MGE says it is due to high levels of natural gas in storage, but does
20 not explain what this means, nor what or who caused the problem.
21 There is no indication that transportation customers or marketers
22 (like Constellation) contributed in any way at all to whatever the

1 vague "storage" problem is that MGE says it is addressing by
2 calling the OFO.

3 **Q. WHAT IS THE EFFECT OF THESE OFO MONTHS ON**
4 **TRANSPORTATION CUSTOMERS AND MARKETERS LIKE**
5 **CONSTELLATION?**

6 A. Normally on the MGE system, differences between deliveries and
7 retainage-adjusted receipts are reconciled and cashed out on a
8 monthly basis, as described under Section A (10) (a) of their
9 proposed new transportation tariff. However, when an OFO is
10 called, daily balancing is effectively required, where penalties are
11 charged on daily imbalances at the levels described in Section B
12 (6) (c) of the proposed MGE tariff.

13 **Q. WHEN MGE CALLS ITS OWN OFOs, IS MGE SUBJECT TO THE SAME**
14 **PENALTIES FROM ITS PIPELINE THAT IT IS FORCING ON**
15 **TRANSPORTATION CUSTOMERS AND MARKETERS?**

16 A. No. This is why allowing MGE to call its own OFOs is fundamentally
17 unfair. By calling an OFO day when its interstate pipeline has not,
18 MGE is imposing a higher standard on balancing accuracy on
19 transportation customers and marketers than MGE itself is held to.

20 **Q. WHAT SHOULD THE COMMISSION DO TO PREVENT THIS UNFAIR**
21 **APPLICATION OF OPERATIONAL FLOW ORDERS (OFOs)?**

1 A. The Commission should require MGE to only issue an OFO when
2 MGE's interstate pipeline has issued an OFO, or in the case of a
3 genuine system operational emergency. In the latter case, MGE
4 should be required to inform transportation customers and the
5 Commission within 24 hours of the operational emergency
6 condition(s) that required the OFO to be issued, and should be
7 required to document that emergency within a reasonable time after
8 it occurred.

9 **Q. THE LANGUAGE IN MGE'S PROPOSED TRANSPORTATION TARIFF,**
10 **SECTION 8 (6) (B), IMPLIES THAT PENALTIES FOR PERIODS OF**
11 **CURTAILMENT (POCs) AND PERIODS OF DAILY BALANCING**
12 **(PODBs) SHALL BE BASED ON THE UNAUTHORIZED USAGE BY THE**
13 **ENTIRE BALANCING GROUP OR POOL. DOES THIS BALANCING BY**
14 **GROUP OR POOL ALSO APPLY TO IMBALANCES ON OFO DAYS?**

15 A. I cannot tell from reading the proposed tariff. However, it should do
16 so. The Commission should require that clarification in MGE's
17 transportation tariff.

18 **Q. IF TELEMETRY WERE TO BE REQUIRED FOR SMALL VOLUME**
19 **TRANSPORTATION CUSTOMERS, WHAT COSTS SHOULD APPLY?**

20 A. The MGE tariff, Sheet 71 (in effect since 1998), shows a charge for
21 telemetry equipment ("EGM," or Electronic Gas Metering charges)
22 of up to \$5,000. In response to Data Requests in this case, MGE

1 has provided documentation showing recent charges to customers
2 for installing telemetry equipment to be a one time charge in the
3 range of \$3,000 to \$4,000. MGE Tariff Sheet 71, and the
4 documentation of these recent charges, are attached to this
5 testimony in Schedule RJH 7. These charges for installation of
6 telemetry equipment are much higher than Constellation has
7 experienced in recent years for customers that choose to take
8 transportation service in other states.

9 **Q. PLEASE PROVIDE EXAMPLES OF THE COMPARABLE CHARGES FOR**
10 **THE INSTALLTION OF TELEMETRY EQUIPMENT IN OTHER STATES.**

11 A. Some utilities do not specify in their tariffs what the charge is for
12 installing telemetry equipment for their customers who desire
13 transportation service. However, I have been able to get
14 information from several sources. (1) Schedule RJH 8 contains
15 Wisconsin utility tariffs showing a range of a one-time charge of
16 \$1,250, to no initial charge but a \$28 per month charge for
17 telemetry. (2) The Illinois utility tariffs included in Schedule RJH 9
18 show no one-time charge for the installation of telemetry
19 equipment, but monthly charges ranging from \$10 to \$28. (3)
20 MidAmerican Energy Company provided me a statement of what
21 they currently charge for the installation of telemetry equipment in
22 the states of Iowa, Nebraska and South Dakota, where they provide
23 gas service. This statement is included in Schedule RJH 10. As I

1 stated in my direct testimony, MidAmerican does not require the
2 installation of telemetry equipment for small volume customers
3 choosing transportation service. The estimated charges in Iowa
4 (\$1,676.42), Nebraska (\$1,610.40) and South Dakota (\$1,380.90)
5 are only for large volume customers.

6 **Q. DO YOU HAVE ADDITIONAL EXAMPLES OF CURRENT TELEMETRY**
7 **COSTS?**

8 A. Yes. Schedule RJH 11 includes selected pages from the initial brief
9 of Minnesota Energy Resources Corporation (MERC) in their recent
10 Minnesota rate case. The last full sentence on the last page of RJH
11 11 (page 55 of the brief) states that, "a small volume transportation
12 customer would be required to make a one-time payment of
13 approximately \$810.00 for the installation of telemetry equipment."

14 **Q. WHAT DOES KANSAS GAS SERVICE CHARGE FOR TELEMETRY?**

15 A. The tariff from Kansas Gas Service, which is shown in Schedule
16 RJH 12, for their Kansas utility operation, shows (on page 42.2)
17 that the charge for electronic flow measurement (EFM) equipment,
18 another name for telemetry equipment, will be \$1,600 per meter if
19 the customer's existing measurement facilities do not require the
20 use of a correction device and \$3,400 if a correction device is
21 required. This is the utility that I mentioned in my direct testimony
22 and stated that, on this same page 42.2, telemetry equipment is not
23 required for transportation service if "a customer may agree to

1 deliver during PODBs and/or POCs a predetermined Required
2 Daily Quantity (RDQ) of natural gas to a transportation service
3 meter which records a peak-month usage of less than 1,500 Mcf in
4 the most recent 12 month period ending April 30, in lieu of the
5 Company's requirement to install EFM."

6 **Q. IS THERE EVIDENCE ALREADY FILED IN THIS CASE OF MGE'S**
7 **ACTUAL COSTS FOR TELEMETRY?**

8 A. Yes. In Staff's Accounting Schedule 3, page 1 of 2, prepared by
9 Karen Herrington, "Electronic Gas Measuring Costs" are shown on
10 line 39 as \$390,663. Divided by the number of LVS customers, 461,
11 MGE's telemetry cost per transportation customer is \$846.00 per
12 customer. Yet, its current tariff, in effect since 1998, provides for
13 MGE to charge up to \$5,000.00 for telemetry.

14 **Q. SHOULD MGE'S TARIFF CHARGE FOR TELEMETRY EQUIPMENT BE**
15 **CHANGED?**

16 A. Yes. The information I have included in this surrebuttal testimony,
17 and the actual cost data in Staff's accounting schedules, vividly
18 demonstrates that MGE's 1998 tariff on telemetry charges needs to
19 be modified to reflect the significantly lower costs of telemetry
20 equipment in recent years. MGE should be ordered to replace its
21 Tariff Sheet 71 with a revised tariff that reflects its actual, current
22 costs for providing telemetry equipment, in line with the current
23 costs of other utilities reflected in this testimony.

1 **Q. PLEASE SUMMARIZE YOUR SURREBUTTAL TESTIMONY.**

2 A. Mr. Kirkland does not present any valid arguments as to why the
3 threshold for transportation service cannot be lowered, with
4 additional customers being allowed to opt for that service. I have
5 identified how this can be accomplished in a manner that leaves
6 MGE revenue-neutral and not adding any costs for the customers
7 choosing to stay on sales service. I agree that any expansion of
8 transportation service would require a transition period, whether or
9 not telemetry equipment is required, although I do not believe
10 telemetry equipment is necessary for small volume transportation
11 customers. I agree with Mr. Johnstone's rebuttal testimony that the
12 cost to serve transportation customers should be lower than the
13 cost to serve similarly situated sales customers, and that MGE's
14 current proposed transportation rules would increase the charges to
15 transportation customers with no cost basis for the increase. I have
16 shown that one of the ways that is true is MGE's use of OFO days
17 when they have not been called by MGE's interstate pipeline or
18 required by an operational emergency on MGE's system. Finally, I
19 have demonstrated that MGE's charges for telemetry equipment
20 are far higher than for utilities in other states and not reflective of
21 current costs for such equipment. MGE should be required to get its
22 charges in line with the utilities I have identified in the states of
23 Illinois, Iowa, Kansas, Minnesota, Nebraska, South Dakota and

1 Wisconsin. MGE's current, unjustified high charges for telemetry
2 equipment denies transportation service to customers who would at
3 least like to consider transportation as an alternative.

4 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

5 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

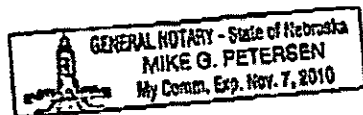
In the Matter of Missouri Gas Energy and)	
Its Tariff Filing To Implement a General)	Case No. GR-2009-0355
Rate Increase for Natural Gas Service)	

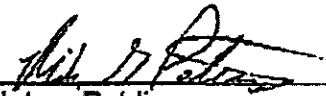
AFFIDAVIT OF RICHARD HAUBENSAK

Richard Haubensak, of lawful age, on his oath, states that he has participated in the preparation of the foregoing Surrebuttal Testimony in question and answer form, to be presented in the above case; that the answers in the foregoing Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.


Richard Haubensak

Subscribed and sworn before me this 13th day of October 2009.




Notary Public

My Commission Expires: Nov 7, 2010

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 5

MidAmerican Energy Company
Compliance Filing of Permanent Small Volume Transportation Tariffs
Filed with the Iowa Utilities Board
October 15, 2008

Schedule RJH 5.2 – 5.7 – Cover Letter and Description of Tariff

Schedule RJH 5.8 – 5.20 – Tariff Sheets

Schedule RJH 5.1



MidAmerican Energy Company
Attn: Suzan M. Stewart
401 Douglas Street
P.O. Box 778
Sioux City, Iowa 51102
712 277-7587 Telephone
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October 15, 2008

BY OVERNIGHT DELIVERY

Ms. Judi Cooper
Executive Secretary
Iowa Utilities Board
310 Maple Street
Des Moines, IA 50319

RE: Compliance Filing of Permanent Small Volume Transportation Tariffs
Docket No. TF-07-220 (SPU-04-1)

Dear Ms. Cooper:

Consistent with and in compliance with the "Order Rejecting Small Volume Gas Transportation Tariff and Directing Filing of Revised Tariff Sheets" ("June 24 Order") issued by the Iowa Utilities Board ("Board") on June 24, 2008, and subsequent "Order Clarifying June 24, 2008, Order and Denying Modification of Order on Rehearing" ("September 16 Order") issued by the Board on September 16, 2008, MidAmerican Energy Company ("MidAmerican") hereby files its proposed permanent small volume transportation tariffs, referred to as its "Monthly Metered Transportation Service" ("MMTS").

DESCRIPTION OF TARIFF

Following is a brief description of the main elements of the new program. This description is intended to highlight and support the main elements of the revisions, but is not intended to be all-inclusive.

Availability - ~~MidAmerican's MMTS is available to nonresidential small~~

~~volume customers defined as those whose usage does not exceed 2,000 therms per day.~~

This definition allows more customers to participate than would be the case if MidAmerican adopted the Board's definition of small volume customer from 199 IAC 19.14(1) and applied the program only to customers with gas usage levels of 25,000 therms per month or 100,000 therms per year. MidAmerican believes that the primary purpose of the Board's cutoff is to ensure customer consumer protections.

~~MidAmerican's proposed eligibility for customers with usage of 2,000 therms per day is consistent with other Iowa utility monthly metered transportation programs.~~

Schedule RJH 5.2

In order to be eligible for MMTS, a customer must purchase natural gas that is transported by the interstate pipeline on a firm basis and must otherwise comply with MidAmerican's administrative requirements for service. A customer may procure gas and administrative services on its own, through use of an agent or by use of the services of a Pool Operator.

Enrollment - ~~MidAmerican will enroll a pilot 500 customer per month, beginning December 1, 2008, for a total of 2,500 customer participants, which as the Board notes on page 20 of the June 24, 2008 order, represents over a threefold increase in small volume transportation participants.~~ An enrolled customer will be charged a \$21 switching fee at the initiation of service, which will be no less than 30 days before the meter read date of the next regular monthly billing cycle. This monthly enrollment limit is adjusted from MidAmerican's original filing, as authorized by the Board. In Board's June 24 Order at p. 20, the Board recognized that there would be a need to adjust the phase-in to meet the reduction in the number of possible MMTS participants from 5,000 to 2,500 customers. This reduction is designed to permit MidAmerican to offer the program to 2,500 total customers before expiration of the current monthly-metered pilot project ("pilot project") in April 2009. The switching fee is waived for pilot project customers transitioning to the new service.

Enrollment will be on a first-come-first-serve basis. MidAmerican believes that first-come-first-serve priority is the appropriate method to eliminate any possible discrimination. MidAmerican recognizes that Iowa Joint Utility Management Program, Inc. ("IJUMP") would like to have its customers transition to this service at the start of the program and that the Board has suggested at p. 5 of its Order Clarifying Order Directing Filing of Permanent Small Volume Transportation Tariffs issued December 21, 2007 that the pilot project customers should be transitioned in the first phase. MidAmerican will work with IJUMP and other pool operators to a resolution of this issue.

Minimum Term and Ability to Switch to Another Regulated Service – Each customer will remain on the service for 12 consecutive months. After the initial 12-month term, a customer may switch to another service.

Pool Operators and Ability to Switch Pool Operators – MidAmerican anticipates that most customers will participate in administered customer pools that will take the responsibility for acquiring, nominating and scheduling gas to meet requirements of a group of customers. The pool operators will be required to comply with any Board requirements applicable to their operations in providing competitive natural gas service. MidAmerican also imposes restrictions on switching pool operators. Only with the May billing cycle will a customer be permitted to switch pool operators, after a minimum 60 days notice and with payment of a fee of \$21 per switched meter. The switching fee will be waived for existing pilot project customers. In June 24 Order, the Board approved the provisions for the switching fee.

Metering, Nominations and Forecasting - The anticipated, or forecasted, daily demand for natural gas will be determined by MidAmerican using a forecasting system instead of a meter. This is deemed the equivalent to the Customer's actual daily consumption for nominating and balancing purposes. For customers participating in pools, daily requirements will be aggregated. The required volume will normally be provided to the Customer or its Pool Operator at least 23 hours in advance to MidAmerican's electronic bulletin board. The Customer or Pool Operator will be required to nominate the forecasted daily supply requirement.

Daily Balancing - The daily balancing charges included in the tariff are the same as in MidAmerican's standard terms and conditions for transportation service and the pilot project. They are measured on the difference between actual daily receipts and forecasted daily delivery requirements. They are (1) \$0.50 for over- and underdeliveries during normal periods; (2) \$1.00 for overdeliveries during critical periods; and (3) for underdeliveries during critical periods, the greater of \$3 or three times the higher of Chicago city-gates or Northern, Ventura "midpoint" Index prices as reported in *Gas Daily*.

Monthly Cashout - MidAmerican is modifying its cashout provisions in this filing. The average index prices will be determined for each calendar month using "Midpoint" gas prices reported in *Gas Daily* and applied to the customer meters for the billing period for that month. The company will post the index points to be used for the calculation on its electronic bulletin board 30 days in advance.

Capacity Release and Alternative Capacity Release Mechanism - There are two capacity release mechanisms in the tariff. First, the tariff includes a mechanism applicable to new customers who do not provide twelve-month notice to MidAmerican of intent to become a transporter. Such new transporters will be required to acquire the applicable portion of interstate pipeline capacity attributable to that customer through a pre-arranged capacity release for a period of one year, at MidAmerican's costs. This released capacity will revert to MidAmerican at the end of the one-year term. As required by the Board in its September 24, 2008 Order, this provision duplicates that of the pilot program.

Second, MidAmerican proposes a capacity release option available to customers after the initial 12-month period, or in the case of pilot customers, when they initiate MMTS. Upon completion of the twelve-month term of the pre-arranged capacity release, a customer has a one-time election to request interstate pipeline transportation capacity from MidAmerican at the applicable contract rates. If the customer does not elect pre-arranged capacity release from MidAmerican at that time, it will be the customer's responsibility to acquire capacity. The customer will not be eligible to obtain released capacity again.

The customer will be required to retain capacity for the entire period for which the customer takes service under MMTS. In the event the customer's transportation is allocated or curtailed by the pipeline, affecting the ability to deliver gas to the customer.

delivery point, MidAmerican will allocate or curtail the customer's gas delivery volume accordingly.

Monthly Charges and Fees

Distribution Service Charges – Are the same as the standard transportation rates.

Clauses and Riders – Are the same as under the standard transportation tariff, with the exception of the addition of the energy efficiency cost recovery rider. Clauses are identical to clauses applied to the pilot project.

The following charges and fees are unique to MMTS and are consistent with those approved in the June 24 Order.

Administrative Fee – \$15.52 per meter. An administrative fee is included in the pilot project.

Swing Service Fee - \$0.0115 per therm. The swing service allows MidAmerican to manage daily volume variations due to model inaccuracies and differences between forecasted and actual weather. This fee is included in the pilot project and employs the same calculation method as used in the pilot project.

Scheduling Fee – A Pool Operator must pay a monthly fee of \$159 to recover the administrative costs incurred by MidAmerican to nominate, schedule and balance for the Pool.

Weekend Service Rider (Optional) - \$0.0024¹ per therm. This optional charge allows Customers to receive forecasted requirement for nonbusiness days so that they can nominate and schedule on these days as well. The charge is imposed on all therms of gas used, not just those used on weekends or holidays.

Non-recurring Fees

Switching Fee - \$21 – applicable when a customer initiates or switches from MMTS, or when it changes Pool Operators.

Annual Reconciliation – MidAmerican will true up the swing service, switching, scheduling, and administrative fees collected from MMTS customers with the actual costs incurred to provide the service for the period. For the first year of true-up, MidAmerican will include the fees collected and costs incurred for the Iowa Schools and Government Entities Gas Pilot Project for the period of September 1, 2007 through the end of the pilot, April 30, 2009. Because these programs will operate concurrently, customers will likely transition from the pilot to the MMTS, and administrative costs

¹The June 24 Order stated the charge as \$0.025 per therm. However, the correct amount, as proposed in MidAmerican's April 14, 2008 tariff filing, is \$0.0024 per therm.

cannot be separately identified for the two services, MidAmerican is proposing to reconcile these as one program.

COMPLIANCE WITH MINIMUM ELEMENTS

In its original November 5, 2007 Order regarding small volume transportation service, the Board required the permanent service offered by gas utilities to contain three features. MidAmerican's revised service filed today continues to comply with these minimum requirements as follows:

(1) **Available to all non-residential small volume customers.** MidAmerican determined that the Board's two-part definition of small volume customers from rule 199 IAC 19.14(1), that sets a monthly consumption threshold of no more than 25,000 therms along with an annual usage requirement of no more 100,000 therms, could be overly restrictive. Accordingly, MidAmerican provided that any customer, as long as it does not use more than 2,000 therms per day, is eligible to participate.

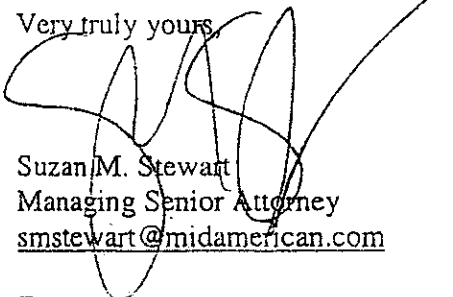
(2) **Reasonable cap on the number of customers.** MidAmerican is proposing to cap its program at 2,500 customers. This is over three times the number of current pilot customers and, as the Board has pointed out in its Order, only a fraction of eligible small volume customers should be expected to move to the service.

The program will be phased in beginning December 1, 2008, and continuing through April 2009. Each month, 450 customers will be placed on the service. This phase-in is proposed for two reasons. First, phasing in will allow the administrative systems supporting small volume transportation to adapt to the changes in customer numbers. Second, the phase in will permit MidAmerican to market the program more effectively.

(3) **Energy Efficiency Cost Recovery.** The tariff provides that customers taking service under this tariff will pay this charge and will be authorized to participate in the programs.

Enclosed in compliance with the Board's rules are four copies of the proposed tariff. Please file stamp the extra copy and return in the self-addressed stamped envelope.

Very truly yours,


Suzan M. Stewart
Managing Senior Attorney
smstewart@midamerican.com

Encs.

CC: Certificate of Service List

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was mailed by U.S. Mail this 15th day of October, 2008 to the following:

LeGrande W. Smith
Cronin Smith, PLC
666 Walnut Street, Ste. 1850
Des Moines, Iowa 50309

Todd Overgard
U.S. Energy Services
1000 Superior Blvd., Suite 201
Wayzata, MN 55391

Kent Ragsdale, Managing Attorney
Interstate Power and Light Company
200 First Street S.E.
P.O. Box 351
Cedar Rapids, IA 52406

Victoria J. Place
Attorney at Law
309 Court Avenue
Des Moines, IA 50309

Richard Haubensak
Cornerstone Energy
12120 Port Grace Blvd. #200
La Vista, NE 68128-8264

Ron Rice
Iowa Association of School Boards
6000 Grand Avenue
Des Moines, IA 50312-1417

John R. Perkins
Consumer Advocate
Iowa Department of Justice
Consumer Advocate Division
310 Maple Street
Des Moines, IA 50319-0063
(3 copies by Hand Delivery)



Suzan M. Stewart.



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

3rd Revised Sheet No. WT-39
Cancels 2nd Revised Sheet No. WT-39

WEEKEND SERVICE RIDER

DESCRIPTION:

A Pool Operator or Customer shall have the option to choose a Weekend Service ("WSR"). WSR provides each Pool Operator with its Forecasted Delivery Requirement concurrent with the Intercontinental Exchange trading schedule. This service allows Pool Operators to nominate and deliver the forecasted requirement provided to them in advance of non-trading days. WSR is available for a minimum twelve (12) month term.

The fee for this optional service shall be:

1. in addition to fees and charges described in the Monthly Metered Transportation Service tariff, and
2. applicable to all therms delivered to Customer Meters in the Pool Operator's or Customer's Pool.

All Rates

\$0.0024 per therm

Issued: October 15, 2008
Issued by: Naomi G. Czechura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)

Schedule RJH 5.8



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-52

MONTHLY METERED TRANSPORTATION SERVICE

AVAILABILITY:

New Customers:

This Monthly Metered Transportation Service Tariff shall apply to natural gas purchased by an eligible Customer from a third party, Pool Operator, or Agent, delivered to Company's system by an interstate natural gas pipeline, and received, transported, and delivered, on a firm basis, by Company to Customer Meter, when the Company and Customer have executed all necessary forms.

Iowa Schools and Government Entities Gas Pilot Project Customers:

Customers enrolled in the Iowa Schools and Government Entities Gas Pilot Project will either be:

- Transitioned to this service upon authorization by the Customer or Agent to change to this service, received by the Company no less than thirty (30) days prior to the meter read date of the Customer's next monthly billing cycle, or
- Returned to Sales Service with the Customer's April 2009 billing cycle read date if no authorization is received by the Company to change to this service.

APPLICABILITY:

This service is available to non-residential small volume customers whose usage does not exceed 2,000 therms per day.

Continuing Customer eligibility for service under this tariff will be reevaluated annually each April. Customers that do not meet the above requirement will be required to switch to a service for which they are eligible.

LIMITATION:

This service will be limited to 2,500 Customers.

Schedule RJH 5.9

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-53

MONTHLY METERED TRANSPORTATION SERVICE

DEFINITIONS:

Except as added or amended below, the definitions of all terms used in this tariff shall be the same as used in other MidAmerican gas tariffs on file with the Board. To the extent that a provision of

- the General Terms and Conditions for Gas Transportation Service is inconsistent with these provisions, the provisions of these definitions shall be controlling and
 - the General Terms and Conditions for Gas Transportation Service is inconsistent with the General Terms and Conditions for Gas Service, the terms applicable to Gas Transportation Service shall be controlling.
1. **Administrative Fee:** Shall mean the monthly fee assessed to recover the cost to implement and operate the Monthly Metered Transportation Service.
 2. **Agent:** Shall mean an organization authorized by a Customer to act on the Customer's behalf.
 3. **Balancing Charges:** Shall mean the charges assessed for any volume variance between the Forecasted Delivery Requirement and the actual physical daily deliveries of natural gas for each Pool.
 4. **Board:** Shall mean the Iowa Utilities Board.
 5. **Cashout Daily or Daily Cashout:** Shall mean the process of reconciling and pricing the volume variance between the daily Pool Operator's Forecasted Delivery Requirement and the actual daily volume received by Company at the Receipt Point.
 6. **Cashout Monthly or Monthly Cashout:** Shall mean the process of reconciling and pricing the volume variance between a Pool Operator's actual monthly consumption and the total monthly forecasted requirement volume.

Schedule RJH 5.10

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-54

MONTHLY METERED TRANSPORTATION SERVICE

DEFINITIONS (Cont.):

7. **Customer:** Shall mean any entity responsible by law for payment of gas service at a single Customer Meter pursuant to this tariff.
8. **Customer Meter:** Shall mean each Customer location where MidAmerican delivers and meters natural gas to a Customer and Customer consumes the gas.
9. **Distribution Service Charge:** Shall mean the dollar amount assessed to the Customer for use of the Company's gas distribution facilities.
10. **Electronic Bulletin Board:** Shall mean the MidAmerican Internet site used by the Company to communicate and exchange information with Customers, Pool Operators, and Agents.
11. **Forecasted Delivery Requirement:** Shall mean the volume in Dekatherms (Dth) determined by MidAmerican that the Pool Operator must deliver on a daily basis to specific interstate pipeline delivery points to meet the natural gas requirements of its Customers, inclusive of Retention volumes associated with distribution system losses.
12. **Gas Transportation or Gas Transportation Tariff:** Shall mean the terms and conditions of the Gas Transportation class of service applicable to the Customer under MidAmerican's tariff.
13. **Imbalance:** Shall mean the volumetric difference between the volume received at the Receipt Point and the Customer's usage.
14. **MidAmerican or Company:** Shall mean MidAmerican Energy Company.
15. **Month, Monthly, Billing Period:** Shall mean the period between the meter readings used for determining the Customer's usage and for calculating the Customer's bill for service.

Schedule RJH 5.11

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-55

MONTHLY METERED TRANSPORTATION SERVICE

DEFINITIONS (Cont.):

- 16. **Nomination:** Shall mean the quantity of gas delivered from the Receipt Point to the Customer Meter inclusive of Retention volumes.
- 17. **Pool:** Shall mean a group of customers with the same balancing provisions, on the same interstate pipeline, and in the same interstate pipeline operational zone who are served by the same Pool Operator and interstate pipeline.
- 18. **Pool Operator:** Shall mean the organization responsible to purchase and cause delivery of, adequate natural gas supplies and associated interstate pipeline transportation to the Receipt Point that is necessary to meet the Customer's Forecasted Delivery Requirements. An Agent may be a Pool Operator.
- 19. **Receipt Point:** Shall mean the location where the Company's gas distribution facilities serving each customer are interconnected with the interstate pipeline's facilities.
- 20. **Retention:** The percentage by which gas received at the Receipt Point is reduced to recover system losses and unaccounted for gas, resulting in the quantity of gas delivered at the Customer Meter.
- 21. **Sales Service:** Shall mean gas service by which the Customer purchases natural gas bundled with gas distribution service from the Company.
- 22. **Scheduling Fee:** Shall mean the monthly fee assessed to each Pool to recover the cost to schedule and balance for the Pool.
- 23. **Supplier:** Shall mean the entity under contract by the Customer, or the Agent, to deliver natural gas to the Company.
- 24. **Swing Service:** Shall mean the service MidAmerican provides to manage the daily volume variations between forecasted and actual usage.

Schedule RJH 5.12

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-56

MONTHLY METERED TRANSPORTATION SERVICE

APPLICATION FOR SERVICE:

1. Customers wanting to take service under this tariff will notify MidAmerican by submitting a completed application via the Company's web enrollment application found on the Company's Electronic Bulletin Board. Customer applications must normally be received thirty (30) days prior to the meter read date of the Customer's next monthly billing cycle. Incomplete or invalid applications will not be accepted by the Company.
2. Upon receipt of a completed application, the Company will determine eligibility for this service in the order applications are received from Customers or Agents.
3. The Company will enroll no more than 450 Customers per month into the program. Completed Customer applications will be processed in the order they are received. The Company will limit total enrollment in this service to 2,500 Customers.
4. Customers will begin this service on the meter read date of the Customer's next monthly billing cycle following the determination that the Customer is eligible to receive service under this tariff. A switching fee of \$21 per Customer Meter will be charged, however, such switching fee will be waived for Customers enrolled in the Iowa Schools and Government Entities Gas Pilot Project as of December 1, 2008.

MINIMUM TERM:

At the end of a minimum period of twelve (12) consecutive months and with thirty (30) days written notice prior to the meter read date of the Customer's next monthly bill cycle, a Customer may switch to Sales Service or Gas Transportation. Switching will be subject to the requirements in the "Switching" section of this tariff.

Schedule RJH 5.13

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-57

MONTHLY METERED TRANSPORTATION SERVICE

CONTRACTS AND AUTHORIZATIONS:

MidAmerican shall enter into a single contract with each Customer, or the Customer's Agent, for distribution service to all Customer Meters that are served under this tariff.

A Customer may designate a Pool Operator to act on the Customer's behalf for the purpose of nominations, balancing, and other Customer obligations under MidAmerican's Gas Tariffs.

Authorization by a Customer to allow an Agent or a Pool Operator to act on a Customer's behalf will require an Authorization and Release form be signed by the Customer and provided to the Company.

MidAmerican shall enter into a contract with a Customer or a Pool Operator on a Customer's behalf that addresses the obligations in respect to Nominations, Balancing Charges, Switching Fees, Cashout, Capacity Assignment, and applicable General Terms and Conditions of MidAmerican's Gas Transportation Tariff.

METERING:

In lieu of installing daily metering and telemetry, MidAmerican will use a load profile to forecast the Customer's daily gas consumption at each Customer Meter. This Forecasted Delivery Requirement shall be used for both nominating and daily balancing purposes. MidAmerican, the Pool Operator, and the Customer agree to consider the Forecasted Delivery Requirement equivalent to the actual gas consumed on any given day.

Schedule RJH 5.14

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-58

MONTHLY METERED TRANSPORTATION SERVICE

CAPACITY RELEASE:

Initial Capacity Release:

For new Customers who did not give MidAmerican twelve (12) months notice of their intent to become transporters, the Pool Operator will acquire the applicable portion of MidAmerican's interstate pipeline capacity attributable to those customers through a pre-arranged capacity release. This pre-arranged release will be for the period of one year, and will be priced at MidAmerican's cost and under the terms and conditions of MidAmerican's applicable contracts. At the end of the one-year period, the pre-arranged release capacity will revert back to MidAmerican.

Optional Capacity Release:

At the time a new Customer has completed the requirements of the initial capacity release, the Customer will be allowed to make a one-time request for capacity released by MidAmerican and MidAmerican may release interstate pipeline transportation capacity to Pool Operators for each Customer enrolled in this service. The transportation capacity shall be used by Pool Operators solely for service to Monthly Metered Transportation customers. In the event primary interstate pipeline transportation delivery point capacity is not available, the Customer will not be able to take optional capacity release under this tariff.

MidAmerican will determine the volume of any capacity to be released for each Customer and this pre-arranged release will be priced at MidAmerican's cost and under the terms and conditions of MidAmerican's applicable contracts. Any applicable surcharges and fuel charges will be paid by the Pool Operator acquiring the capacity. These charges will be paid directly to the applicable interstate pipeline. The acquiring Pool Operator will be required to meet the creditworthiness criteria of MidAmerican and the applicable interstate pipeline.

The Pool Operator will be responsible for any incremental interstate pipeline transportation charges that may occur if any delivery point restrictions under MidAmerican's contracts with the interstate pipeline are violated. Applicable delivery point restriction(s) will be noted on the capacity release postings.

Schedule RJH 5.15

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-60

MONTHLY METERED TRANSPORTATION SERVICE

POOL OPERATOR ELIGIBILITY:

Pool Operators must comply with any Board certification requirements and applicable laws and regulations in order to provide competitive natural gas services to Iowa retail end users.

Pool Operators must be authorized by the Company and execute a contract with the Company. Eligible Pool Operators will be posted on the Company's Electronic Bulletin Board.

POOLS:

Pool Operators will be required to group Customers with the same balancing provisions, on the same interstate pipeline, and in the same interstate pipeline operational zone. MidAmerican will provide Forecasted Delivery Requirements for Customers in each Pool.

NOMINATIONS:

MidAmerican will utilize historical billing information to model each Customer's load profile and calculate the Forecasted Delivery Requirement using such profile and forecasted weather. A Customer's Forecasted Delivery Requirement for a new facility will be based on the estimated usage provided by the Pool Operator at the time of enrollment and profiles of similar Customers.

The Forecasted Delivery Requirement will be aggregated by Pool. The Forecasted Delivery Requirement will normally be provided 23 hours before the gas day begins using the Company's Electronic Bulletin Board and will include Retention volumes.

The Pool Operator will nominate the Forecasted Delivery Requirement to the interstate pipeline and MidAmerican. If the Pool Operator does not deliver the Forecasted Delivery Requirement posted on Company's Electronic Bulletin Board on any particular day, then the greater of any applicable pro-rata share of interstate pipeline penalties or Balancing Charges outlined in this tariff, will be billed to the Pool Operator.

Schedule RJH 5.16

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-61

MONTHLY METERED TRANSPORTATION SERVICE

NOMINATIONS (Cont.)

In the event the Customer's transportation is allocated or curtailed, affecting Company's ability to deliver gas to the Customer's delivery point, such allocation or curtailment of Customer's gas delivery volumes shall be likewise allocated or curtailed.

SWING SERVICE:

A Swing Service fee will be collected from the Customer on all therms. MidAmerican reserves the right to recalculate the Swing Service fee annually.

DAILY CASHOUT:

MidAmerican will bill the accumulated Daily Cashout to the Pool Operator on a monthly basis. See MidAmerican's current Gas Transportation Tariff, "Settlement of Imbalances." These volumes will be subject to the balancing charges shown in "Applicable Pool Operator Fees and Charges" section of this tariff.

MONTHLY CASHOUT:

Cashout of the Monthly Imbalances for all of the Customer Meters will be settled monthly between MidAmerican and the Pool Operator.

Average index prices used for the Monthly Cashout shall be determined for each calendar month, using the quoted "Midpoint" gas price as appearing in Gas Daily. The Company will post the pricing index points to be used for the Monthly Cashout calculation for each interstate pipeline on the Company's Electronic Bulletin Board. Any changes in pricing index points will be posted on the Company's Electronic Bulletin Board and will be effective on the first day of the month following a minimum thirty (30) day advance posting.

The applicable average monthly index price for each pipeline will be used in the Monthly Cashout calculation for both the cumulative daily positive and negative imbalances at the Customer Meter.

Schedule RJH 5.17

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-62

MONTHLY METERED TRANSPORTATION SERVICE

MONTHLY CASHOUT (Cont.):

The cumulative daily positive imbalances at a Customer Meter will be deemed to have been purchased by the Company at the applicable calendar average monthly index price plus applicable interstate pipeline transportation fees and Company Retention. Such price will be applied to each therm purchased by MidAmerican.

The cumulative daily negative imbalances at a Customer Meter will be deemed to have been sold by the Company at the applicable calendar average monthly index price plus applicable interstate pipeline transportation fees and Company Retention. Such price will be applied to each therm sold by MidAmerican.

APPLICABLE CUSTOMER FEES AND CHARGES:

MidAmerican will calculate charges for each Customer Meter served under this tariff as follows:

Distribution Service Charges:

East System (Rate 70M):

Basic Service Charge per Customer Meter	\$10.00 per month
Distribution Charge:	
For the first 250 therms	\$0.14300 per therm
For the next 750 therms	\$0.09508 per therm
For all in excess of 1,000 therms	\$0.07120 per therm

West System (Rate STM – Small Transport):

Service Charge per Meter:	\$10.00 per month
Distribution Charge:	
For the first 250 therms	\$0.17993 per therm
For all in excess of 250 therms	\$0.09508 per therm

West System (Rate MTM – Medium Transport):

Service Charge per Meter:	\$55.00 per month
Distribution Charge:	
All therms	\$0.07120 per therm

Schedule RJH 5.18

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)



MIDAMERICAN ENERGY COMPANY
Gas Tariff No. 1
Filed with the Iowa Utilities Board

Original Sheet No. WT-63

MONTHLY METERED TRANSPORTATION SERVICE

APPLICABLE CUSTOMER FEES AND CHARGES (Cont.):

Clauses and Riders:

The above Distribution Service Charges are subject to applicable clauses and riders, which are currently:

1. Btu Adjustment Clause.
2. Gas Energy Efficiency Cost Recovery Rider.
3. Gas Tax Adjustment Clause.
4. Pipeline Transition Rider.

MidAmerican will read each meter and calculate Distribution Service Charges and applicable clauses and rider charges on the regular cycle billing schedule. Three billing options available for delivery of Customer Distribution Service Charges are:

1. Separate Billing to Pool Operator. With Customer approval and at the Pool Operator's request, MidAmerican will send a bill to the Pool Operator for each Customer Meter.
2. Summary Billing to Pool Operator. MidAmerican will send up to four (4) summary invoices each month to the Pool Operator summarizing the charges for each Customer. MidAmerican will select a billing cycle for each summary bill generated by MidAmerican.
3. Standard Billing. MidAmerican will send the monthly bill directly to the Customer.

Schedule RJH 5.19

Issued: October 15, 2008
Issued by: Naomi G. Czachura
Vice President

Effective: December 1, 2008
Per September 16, 2008 Board
Order in Docket No. TF-07-220 (SPU-04-1)

MONTHLY METERED TRANSPORTATION SERVICE

APPLICABLE CUSTOMER FEES AND CHARGES (Cont.):

Administrative Fee:

All Rates \$15.52 per Meter per month

The Administrative Fee will apply to both East and West systems and to all Customer Meters served under this tariff.

Swing Service Fee:

All Rates	\$0.0115 per therm
-----------	--------------------

The fee for Swing Service will be collected and the revenues will be credited to the monthly Cost of Purchased Gas Adjustment Clause.

APPLICABLE POOL OPERATOR FEES AND CHARGES:

Scheduling Fee per Pool:

\$ 159.00 per month

A monthly scheduling fee will be charged to each Pool as payment for Company releasing capacity, confirming, and scheduling the Forecasted Delivery Requirement.

Daily Cashout Charges:

The Pool Operator will be charged monthly for the accumulated daily imbalances as outlined in the "Daily Cashout" section of this tariff. Resulting revenues or costs will be included in the monthly Cost of Purchased Gas Adjustment Clause.

Schedule RJH 5.20

Issued by: Naomi G. Czachura
Vice President

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 6

MGE Operational Flow Order (OFO) Notices:

Schedule RJH 6.2 – OFO Notice of August 24, 2009

Schedule RJH 6.3 – OFO Notice of September 24, 2009

Schedule RJH 6.1

From: Wetsch, Nancy
Sent: Monday, August 24, 2009 5:50 PM
To:
Subject: Operational Flow Order
Importance: High

NOTICE OF OPERATIONAL FLOW ORDER

In accordance with Missouri Gas Energy (MGE) Tariff Sheet Numbers 61.4 thru 67; MGE is issuing an Operational Flow Order (OFO) effective September 1, 2009 **for the entire month of September**. MGE is issuing the OFO due to high levels of natural gas in storage. **The OFO has been issued for UNDER-DELIVERIES only.** During the OFO, penalties are assessed when daily Authorized Usage (retainage adjusted pipeline receipts) exceeds daily deliveries to EGM meters greater than 5% of Authorized Usage.

All large volume customers and shipper/marketers are asked to manage their energy needs and make sure their daily nomination does not exceed their daily consumption of fuel during this period. Should you have any questions, please call Jim Ferneau at 816-360-5871, Teresa Villanueva at 816-360-5701, or Nancy Wetsch at 816-360-5552.

Nancy Wetsch
Missouri Gas Energy
Gas Supply Specialist

From: Wetsch, Nancy
Sent: Thursday, September 24, 2009 5:46 PM
To:
Subject: OCTOBER OPERATIONAL FLOW ORDER

Importance: High

NOTICE OF OPERATIONAL FLOW ORDER

In accordance with Missouri Gas Energy (MGE) Tariff Sheet Numbers 61.4 thru 67; MGE is issuing an Operational Flow Order (OFO) effective **October 1, 2009 for the entire month of October, or until further notice, for the Southern Star Central Pipeline and Kansas Pipeline Company/Quest**. MGE is issuing the OFO due to high levels of natural gas in storage. **The OFO has been issued for UNDER-DELIVERIES only.** During the OFO, penalties are assessed when daily Authorized Usage (retainage adjusted pipeline receipts) exceeds daily deliveries to EGM meters greater than 5% of Authorized Usage.

All large volume customers and shipper/marketers are asked to manage their energy needs and ensure their daily nomination does not exceed their daily consumption by more than 5% of authorized daily delivery levels of fuel during this period. Should you have any questions, please call Jim Ferneau at 816-360-5871, Teresa Villanueva at 816-360-5701, or Nancy Wetsch at 816-360-5552.

Thank you,

Nancy Wetsch
Missouri Gas Energy
Gas Supply Specialist

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 7

Schedule RJH 7.2 – MGE P.S.C. MO. No. 1, Sheet No. 71
(effective September 2, 1998) –
Electronic Gas Measurement (EGM) Equipment (Telemetry)

Schedules RJH 7.3 – 7.6 – MGE Billings to Customers for EGM,
May-October 2009

Schedule RJH 7.1

FORM NO. 13

P.S.C. MO. No. 1

Canceling P.S.C. MO. No. 1

First Revised

Original

SHEET No. 71

SHEET No. 71

Missouri Gas Energy,
a Division of Southern Union Company

For: All Missouri Service Areas

ELECTRONIC GAS MEASUREMENT EQUIPMENT

EGM

Missouri Public
Service Commission

REC'D AUG 28 1998

EGM CHARGES

Customer shall reimburse Company for the installed cost of EGM equipment not to exceed the cost as set out below and pay a monthly fee for the operations and maintenance as set out below.

Equipment Charges

Per Meter Site (includes one instrument point),
plus applicable income taxes: \$5,000

Each additional Instrument Point
(maximum of three additional at same meter site),
plus applicable income taxes: \$2,000

An additional charge of \$3,000 plus applicable income taxes will be assessed to customers served by orifice meters due to the complexity of the installation.

Charges shall be assessed in a non-discriminatory manner for customers with similar meter characteristics and EGM equipment requirements.

Monthly Charge

The customer shall pay for the operation and maintenance of the EGM equipment through a monthly facilities charge of \$25 for each EGM device installed beginning at the time of installation.

DEFINITIONS

Meter Site:

A gas metering facility that serves a single or multiple contiguous meter runs at one location. Meters must be within a 50 foot radius to be considered contiguous.

Missouri Public
Service Commission

98 - 140
FILED SEP 02 1998

DATE OF ISSUE August 28 1998
month day year

DATE EFFECTIVE September 27 1998
month day year
SEP 02 1998

ISSUED BY: Charles B. Hernandez

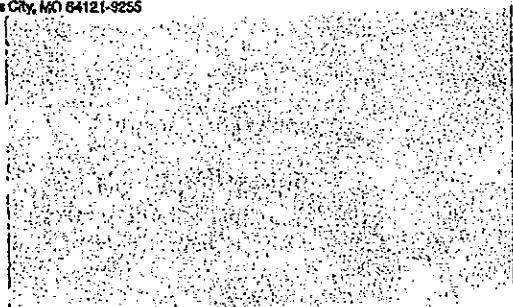
Director, Pricing and Regulatory Affairs
Missouri Gas Energy, Kansas City, MO. 64111

Schedule RJH 7.2

**MISSOURI GAS ENERGY**

A Division of Southern Union Company
www.missourigasenergy.com
PO Box 412662
Kansas City, MO 64121-9255

May 5, 2009

**ELECTRONIC GAS MEASUREMENT EQUIPMENT
(EGM) CHARGES****BREAKDOWN:**

MATERIALS*	\$2,660.66
LABOR	\$169.90
TAXES	\$251.92
TOTAL	\$3,082.48

This is NOT a separate billing. These charges appear on your bill this month. This is a breakdown of the charges for your records.

- Materials Charges will typically include:
- The Electronic Corrector
- Temperature Probes
- Transducers
- Various circuit boards

The enclosed bill includes charges for installation of electronic gas measurement (EGM). EGM allows your company to enjoy the benefits of purchasing natural gas as a Large Volume Service customer rather than a Large General Service customer. The charges reflect the lesser of actual costs or the maximum charge as stated in the EGM tariff, plus applicable income taxes.

You may finance these costs over a three year period at 8% per annum. If you wish to take advantage of the financing option, please call Teresa Villanueva at 816-360-5701.

Effective with the bill, your monthly bill will include a monthly facilities charge of \$25.00 per EGM meter site for the operation of maintenance of the EGM equipment installed.

If you have any questions regarding the billing of EGM equipment, please contact Teresa Villanueva at 816-360-5701.

Thank you. It is our pleasure to serve you.

June 3, 2009

**ELECTRONIC GAS MEASUREMENT EQUIPMENT
(EGM) CHARGES**

BREAKDOWN:

MATERIALS*	\$2,802.68
LABOR	\$193.92
TAXES	\$266.70
TOTAL	\$3,263.30

This is NOT a separate billing. These charges appear on your bill this month. This is a breakdown of the charges for your records.

- Materials Charges will typically include:
- The Electronic Corrector
- Temperature Probes
- Transducers
- Various circuit boards

The enclosed bill includes charges for installation of electronic gas measurement (EGM). EGM allows your company to enjoy the benefits of purchasing natural gas as a Large Volume Service customer rather than a Large General Service customer. The charges reflect the lesser of actual costs or the maximum charge as stated in the EGM tariff, plus applicable income taxes.

You may finance these costs over a three year period at 8% per annum. If you wish to take advantage of the financing option, please call Teresa Villanueva at 816-360-5701.

Effective with the bill, your monthly bill will include a monthly facilities charge of \$25.00 per EGM meter site for the operation and maintenance of the EGM equipment installed.

If you have any questions regarding the billing of EGM equipment, please contact Teresa Villanueva at 816-360-5701.

Thank you. It is our pleasure to serve you.

September 3, 2009

**ELECTRONIC GAS MEASUREMENT EQUIPMENT
(EGM) CHARGES**

BREAKDOWN:

MATERIALS*	\$3,399.23
LABOR	\$426.72
TAXES	\$340.51
TOTAL	\$4,166.46

This is NOT a separate billing. These charges appear on your bill this month. This is a breakdown of the charges for your records.

- Materials Charges will typically include:
- The Electronic Corrector
- Temperature Probes
- Transducers
- Various circuit boards

The enclosed bill includes charges for installation of electronic gas measurement (EGM). EGM allows your company to enjoy the benefits of purchasing natural gas as a Large Volume Service customer rather than a Large General Service customer. The charges reflect the lesser of actual costs or the maximum charge as stated in the EGM tariff, plus applicable income taxes.

You may finance these costs over a three year period at 8% per annum. If you wish to take advantage of the financing option, please call Teresa Villanueva at 816-360-5701.

Effective with the bill, your monthly bill will include a monthly facilities charge of \$25.00 per EGM meter site for the operation of maintenance of the EGM equipment installed.

If you have any questions regarding the billing of EGM equipment, please contact Teresa Villanueva at 816-360-5701.

Thank you. It is our pleasure to serve you.

Schedule RJH 7.5

October 5, 2009

**ELECTRONIC GAS MEASUREMENT EQUIPMENT
(EGM) CHARGES**

BREAKDOWN:

MATERIALS*	\$3,302.35
LABOR	\$426.72
TAXES	\$331.89
TOTAL	\$4,060.96

This is NOT a separate billing. These charges appear on your bill this month. This is a breakdown of the charges for your records.

- Materials Charges will typically include:
- The Electronic Corrector
- Temperature Probes
- Transducers
- Various circuit boards

The enclosed bill includes charges for installation of electronic gas measurement (EGM). EGM allows your company to enjoy the benefits of purchasing natural gas as a Large Volume Service customer rather than a Large General Service customer. The charges reflect the lesser of actual costs or the maximum charge as stated in the EGM tariff, plus applicable income taxes.

You may finance these costs over a three year period at 8% per annum. If you wish to take advantage of the financing option, please call Teresa Villanueva at 816-360-5701.

Effective with the bill, your monthly bill will include a monthly facilities charge of \$25.00 per EGM meter site for the operation and maintenance of the EGM equipment installed.

If you have any questions regarding the billing of EGM equipment, please contact Teresa Villanueva at 816-360-5701.

Thank you. It is our pleasure to serve you.

Schedule RJH 7.6

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 8

Wisconsin Tariffs – Telemetry Costs

Schedule RJH 8.2 – Wisconsin Electric – Gas Operations

Schedule RJH 8.3 – Wisconsin Gas LLC

Schedule RJH 8.4 – Wisconsin Public Service Corporation

Schedule RJH 8.1

Late Payment Charges

A one percent (1.0%) per month late payment will be applied to outstanding charges past due. Bills are considered past due if charges remain unpaid 20 calendar days from the issuance of the bill.

Disconnection FeesAll Customer Classes

- Disconnection fee is \$36 per meter during regular work hours for gas service customers only.
- Disconnection fee is \$48 per meter for other than regular work hours for gas service customers only.
- For applicability of Disconnection fees see schedule X-330.

Reconnection FeesAll Customer Classes

- Reconnection fee is \$36 per meter during regular work hours for gas service customers only.
- Reconnection fee is \$48 per meter for other than regular work hours for gas service customers only.
- For applicability of Reconnection fees see schedule X-330.

Returned Check Fees

For each dishonored check that is returned to the company, a processing fee of \$15 shall be charged to cover the company's cost of processing the dishonored check, and further, the company shall pass through to the customer (in addition to the processing fee) any actual bank charges incurred or imputed by the company which arise from the check being returned to the company.

Remote Meter Reading Equipment Charge

A one-time non-refundable remote meter reading equipment charge of \$1,250 shall be assessed to customers requiring remote meter reading equipment.

Schedule RJH 8.2

Late Payment Charges

A one percent (1.0%) per month late payment will be applied to outstanding charges past due. Bills are considered past due if charges remain unpaid 20 calendar days from the issuance of the bill.

Disconnection FeesAll Customer Classes

- Disconnection fee is \$36 per meter during regular work hours for gas service customers only.
- Disconnection fee is \$48 per meter for other than regular work hours for gas service customers only.
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Reconnection FeesAll Customer Classes

- Reconnection fee is \$36 per meter during regular work hours for gas service customers only.
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Remote Meter Reading Equipment Charge

A one-time non-refundable remote meter reading equipment charge of \$1,250 shall be assessed to customers requiring remote meter reading equipment.

WISCONSIN PUBLIC SERVICE CORPORATION

P.S.C.W. Volume No. 8

11th Rev. Sheet No. G6.00
Replaces 10th Rev. Sheet No. G6.00
Amendment 605 Schedule GCg-F

Commercial and Industrial Firm Service

Natural Gas

1. EFFECTIVE IN: All territory served.
2. AVAILABILITY: This schedule is available for service to Commercial and Industrial customers, as defined in rate schedule GSRX. This is a Firm Gas Supply Service.
3. RATES: The rates for this service are as follows:

Daily/Monthly Charges per Meter:

Customer Class	Annual Usage (Therms)	Local Distribution Service			
		Fixed Year Round		Fixed Seasonal	
		Daily	Monthly	Daily	Monthly
R Cg-FST	Up to 2,000	\$0.2301	\$7.00	\$0.4602	\$14.00
R Cg-FS	2,001 to 20,000	\$0.6904	\$21.00	\$1.3808	\$42.00
R Cg-FM	20,001 to 200,000	\$3.1233	\$95.00	\$6.2466	\$190.00
R Cg-FL	200,001 or more	\$20.4821	\$623.00	\$40.9643	\$1,246.00

Customer Class	Annual Usage (Therms)	Local Distribution Service		Gas Supply Acquisition Service (per Therm)	Total Volumetric (per Therm)
		Demand Rate*	Volumetric (per Therm)		
R Cg-FST	Up to 2,000	\$0.0000	\$0.2694	\$0.0368	\$0.3062
R Cg-FS	2,001 to 20,000	\$0.0000	\$0.1394	\$0.0368	\$0.1762
R Cg-FM	20,001 to 200,000	\$0.0000	\$0.0797	\$0.0368	\$0.1165
R Cg-FL	200,001 or more	\$0.1475	\$0.0330	\$0.0288	\$0.3619

(*Demand Rate Per Therm of Demand)

Natural Gas Costs - All Therms - See Sheet No. G8.04 for currently effective Rates.

Rate Per Therm - All Therms - See Sheet No. G8.04 for currently effective Rates.

Local Distribution Service Demand Charges: Each month, the Local Distribution Service Demand charges will equal the Local Distribution Service Demand Rate times the customer's largest daily gas usage on any Gas Day during the 12 most recent billing months.

4. PURCHASED GAS ADJUSTMENT CLAUSE:
Therms billed under this rate are subject to the Purchased Gas Adjustment Clause.

R *This charge includes a \$28.00 per month Enhanced Telemetering Charge.

Continued to Sheet No. G6.01.

Issued 12-30-08

Effective for Service Rendered
On and After 01-01-09

PSCW Authorization By Order 6690-UR-119 Dated 12-30-08

Schedule RJH 8.4

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 9

Illinois Tariffs – Telemetry Costs

Schedules RJH 9.2 – 9.5 – Northern Illinois Gas Company
d/b/a Nicor Gas Company

Schedule RJH 9.6 – The Peoples Gas Light and Coke Company

Schedule RJH 9.7 – Illinois Power Company d/b/a AmerenIP

Schedules RJH 9.8 – 9.9 Central Illinois Light Company d/b/a AmerenCILCO

Schedule RJH 9.1

**Northern Illinois Gas Company
d/b/a Nicor Gas Company**

ILC.C. No. 16 - Gas
7th Revised Sheet No. 18
(Canceling 5th Revised Sheet
No. 18, Effective November 22,
2005)

**Rate 74
General Transportation Service**

Availability.

For any commercial or industrial Customer at a single location who enters into a contract with the Company hereunder, to transport Customer-owned gas from an interconnection with a pipeline supplier of the Company to the Customer's premises; and

- (a) where the Customer has contracted for transportation of direct purchases from the delivery point of the seller to an existing interstate pipeline interconnection with the Company's facilities as approved by the Company, which interconnection, in the sole judgment of the Company, is capable of receiving the Customer's gas without impairment of anticipated deliveries of any gas supplies to be purchased by the Company for general system use; and
- (b) where the final pipeline transporter of such Customer-owned gas agrees to provide daily delivery data for such gas to the Company; and
- (c) where satisfactory evidence of Customer's contracts with seller(s) and intrastate or interstate transporters are provided to the Company; and
- (d) where all such arrangements have been approved by each regulatory agency having jurisdiction over such matters, to the satisfaction of the Company; and
- (e) where Customer provides a telephone line to within six (6) feet of the meter, which telephone line shall be directly accessible. The telephone line must terminate with an approved demarcation box. The Customer's telephone service must conform to the specifications of the metering equipment, and the metering equipment will not be installed by the Company until the required telephone line is available.

Customers served hereunder shall have their metered usage and nominations daily balanced in accordance with any transportation and storage provisions.

*** Charges shall be the sum of (a) through (f).**

- (a) Administrative Charge
\$23.00 per month for an individual account. Group accounts will be charged \$10.00 per month per account with a minimum group charge of \$33.00.
- (b) Recording Device Charge
\$10.00 per month per each account with a diaphragm meter; or
\$17.00 per month for each account for all other meter types.

(Continued On Sheet No. 19)

Filed with the Illinois Commerce Commission on March 31, 2009
Issued pursuant to order of the Illinois Commerce Commission
entered March 25, 2009 in Docket No. 08-0363
Items in which there are changes are preceded by an asterisk (*)

Effective April 3, 2009
Issued by - Gerald P. O'Connor
Senior Vice President
Post Office Box 190
Aurora, Illinois 60507

Schedule RJH 9.2

**Rate 74
General Transportation Service**

(Continued From Sheet No. 18)

- (c) Monthly Customer Charge
The monthly Customer Charge shall be based on meter class capacity in cubic feet per hour (cfh) at low pressure delivery as follows:

	<u>Meter Class</u>
\$ 20.35 per month	A. (less than 1,000 cfh)
\$ 71.00 per month	B. (1,000-10,000 cfh)
\$129.65 per month	C. (greater than 10,000 cfh)

- (d) Distribution Charge

	<u>Therms Supplied in the Month</u>
10.56¢ per therm	for the first 150
4.11¢ per therm	for the next 4,850
3.49¢ per therm	for all over 5,000

- (e) Storage Banking Service (SBS) Charge
0.34¢ per therm per month for all therms of Storage Banking Service capacity.

Customers may annually select Storage Banking Service capacity with a minimum selection of 1 times their Maximum Daily Contract Quantity (MDCQ) subject to the provisions included in Terms and Conditions.

For each therm of Company-supplied Gas delivered under this service, the charge shall be considered Authorized Use.

- (f) Firm Backup Service (FBS) Charge
The monthly charge for Firm Backup Service shall be the selected Firm Backup Service quantity (in therms) multiplied by the Demand Gas Cost (DGC) as defined in Rider 6.

For each therm of Company-supplied Gas delivered under this service, the charge shall be the Rider 6 Commodity Gas Cost (CGC).

- (g) Excess Storage Charge
10¢ per therm for the maximum amount in storage in excess of the Customer's Storage Banking Service capacity on any day during the billing period. If such maximum excess amount is less than five percent of the Customer's Storage Banking Service capacity, the Excess Storage Charge shall not apply. Revenues arising through the application of the Excess Storage Charge will be credited to Rider 6, Gas Supply Cost.

(Continued On Sheet No. 20)

**Northern Illinois Gas Company
d/b/a Nicor Gas Company**

Ill.C.C. No. 16 - Gas
7th Revised Sheet No. 76
(Canceling 5th Revised Sheet No. 76,
Effective November 22, 2005)

**Rider 25
Firm Transportation Service**

Applicable to Rates 4, 5, 6 and 7

Availability.

For any commercial or industrial Customer at a single location who enters into a contract with the Company hereunder, to transport Customer-owned gas from an interconnection with a pipeline supplier of the Company to the Customer's premises; and

- (a) where the Customer has contracted for transportation of direct purchases from the delivery point of the seller to an existing interstate pipeline interconnection with the Company's facilities as approved by the Company, which interconnection, in the sole judgment of the Company, is capable of receiving sales and transportation Customers gas without impairment of anticipated deliveries of any gas supplies, and
- (b) where the final pipeline transporter of such Customer-owned gas agrees to provide daily delivery data for such gas to the Company; and
- (c) where satisfactory evidence of Customer's contracts with seller(s) and intrastate or interstate transporters are provided to the Company; and
- (d) where all such arrangements have been approved by each regulatory agency having jurisdiction over such matters, to the satisfaction of the Company.

*** Charges shall be the sum of (a) through (g).**

- (a) Administrative Charge
\$23.00 per month for an individual account. Group accounts will be charged \$10.00 per month per account with a minimum group charge of \$33.00.
- (b) System Charge
The monthly Customer, distribution, demand and commodity charges, as applicable under the rate which services the Customer, for the total Customer usage in the billing month.
- (c) Gas Supply Cost
For Customers served under Rider 25, the Gas Supply Cost shall be the sum of the following: (1) 0.47 times the Customer's Maximum Daily Contract Quantity multiplied by the Demand Gas Cost (DGC); plus (2) the Commodity Gas Cost (CGC) multiplied by the volume of Company-supplied gas delivered to the Customer in the billing period.

(Continued On Sheet No. 77)

Filed with the Illinois Commerce Commission on March 31, 2009
Issued pursuant to order of the Illinois Commerce Commission
entered March 25, 2009 in Docket No. 08-0363
Items in which there are changes are preceded by an asterisk (*)

Effective April 3, 2009
Issued by - Gerald P. O'Connor
Senior Vice President
Post Office Box 190
Aurora, Illinois 60507

Schedule RJH 9.4

Rider 25
Firm Transportation Service

(Continued From Sheet No. 76)

All such Gas Supply Cost charges described above shall be determined in accordance with Rider 6, Gas Supply Cost, for the billing period.

- * Customers served under Rates 4 and 5 shall receive a Transportation Service Credit (TSC) consisting of the sum of (1) a 1.12 cent per therm credit for the Company's uncollectible gas expense, (2) a 0.62 cent per therm storage withdrawal adjustment credit, and (3) a 0.34 cent per therm credit for gas in storage multiplied by the quantity of customer-owned gas used during a Customer's billing period. Customers served under Rate 6 shall receive a Transportation Service Credit (TSC) consisting of the sum of (1) a 0.19 cent per therm for the storage withdrawal adjustment credit, and (2) a 0.10 cent per therm credit for gas in storage multiplied by the quantity of customer-owned gas used during a Customer's billing period.

If, in any billing period, there is no Customer-owned gas available from storage or delivered to the Customer, the Gas Supply Cost Section of the Charges provision of the rate under which the Customer is served shall apply in lieu of the Gas Supply Cost Section hereunder.

- *(d) Excess Storage Charge
10¢ per therm for each therm in storage in excess of 28 times (31 times as of the first June 1 after the Effective Date of this tariff) the Customer's Maximum Daily Contract Quantity during the billing period. If such excess amount is less than five percent of the Customer's allowed Storage Banking Capacity, the Excess Storage Charge shall not apply. Such revenues arising through the application of the Excess Storage Charge will be credited to Rider 6, Gas Supply Cost.
- (e) Transportation Service Adjustment
The Transportation Service Adjustment (TSA) per therm, as determined in Rider 6, Gas Supply Cost, applied to total Customer usage less Company Supplied Gas.
- *(f) Optional Recording Device Charge
\$10.00 per month per each account with a diaphragm meter; or
\$17.00 per month for each account for all other meter types.
- (g) Operational Flow Order (OFO) Non-Performance Charge
On any day where the Company has imposed an Operational Flow Order, each therm of overdelivery of the Required Daily Delivery Range will be purchased from the Customer and the payment will be 50% of the low price of gas as reported for Chicago citygate deliveries by Gas Daily for each day of Non-Performance. In the event that Gas Daily is unavailable, then a reported Chicago citygate price of another similar publication, as determined in the Company's sole discretion, shall be used.

(Continued On Sheet No. 78)

The Peoples Gas Light and Coke Company

RIDER TO SCHEDULE OF RATES FOR GAS SERVICE

Page 4 of 13

Rider SST

Selected Standby Transportation Service

Applicable to Service Classification Nos. 2, 4, 6 and 8

Section A - Definitions - continued

Supply Surplus Day shall mean a Critical Day when the Company anticipates supply in excess of requirements.

Unaccounted for Gas shall mean the quantity of customer-owned gas the Company shall retain at the time of delivery into its system, representing the customer's proportionate share of Unaccounted for Gas. Such quantity shall equal the number of therms delivered by the customer to the Company's system under this rider multiplied by the effective Factor U, as defined in the Terms and Conditions of Service of this rate schedule.

Unauthorized Use of Gas shall mean the sum of Daily Unauthorized Use plus Monthly Unauthorized Use.

Section B - Rates

The rates for service hereunder shall consist of an Administrative Charge, a Cash-out Charge, a Daily Demand Measurement Device Charge, an Imbalance Account Charge, an Imbalance Trade Charge, a Standby Commodity Charge, a Standby Demand Charge and an Unauthorized Use Charge as well as those charges defined in the customer's Companion Classification.

For a customer that is a member of a Customer Group as defined under Rider P of this rate schedule, the Company shall bill a Daily Demand Measurement Device Charge and a Standby Demand Charge as well as those charges defined in the customer's Companion Classification.

Administrative Charge

The monthly Administrative Charge shall be \$11.24 per account for each account listed on a contract.

Cash-out Charge

The monthly Cash-out Charge shall be applied to any remaining imbalance calculated in accordance with Section H of this rider and be based on the percentage of that imbalance compared to the total deliveries to the customer during the month.

Daily Demand Measurement Device Charge

A Daily Demand Measurement Device shall be required for each meter at which service is taken under this rider. For each such device installed by the Company to meet this requirement, the monthly charge shall be \$28.00. Charges billed under this provision shall begin with the bill for the first full month following installation, and shall not apply for a device installed as an incident of service under the customer's Companion Classification.

Date Issued: FEBRUARY 8, 2008

Date Effective: FEBRUARY 14, 2008

Issued by James F. Schott, Vice President
130 East Randolph Drive, Chicago, Illinois 60601

Filed Pursuant to Order of Illinois Commerce Commission
Entered February 5, 2008 in Docket No. 07-0242

RIDER T – TRANSPORTATION SERVICE
Applicable to Rate GDS-2, GDS-3, GDS-4, GDS-5 and GDS-7

2. The final pipeline transporter of such Customer-owned gas agrees to provide daily delivery data for such gas to the Company.

Company reserves the right to require usage of Customer-Owned Gas to be uniform over the day when a pipeline imposes a requirement on Company to accept Delivery of gas uniformly over the day. Company shall be entitled to bill and collect from Customer any penalties or fees charged by such pipeline attributable to such Customer's non-conformance with Company's direction to take Delivery uniformly over the day.

When service under this Rider is terminated, the cashout price for Customers Bank, if applicable, shall be the Chicago Citygate First of the Month price index as reported in "Inside FERC Gas Market Report" for the month following the end of Rider T service.

Service hereunder is subject to the Customer Terms and Conditions, Supplier Terms and Conditions, Standards and Qualifications for Gas Service, Tax Additions, and Supplemental Customer Charge Tariffs of this Schedule, as well as any other applicable Rates, Riders, taxes, adjustments, fees or charges that may be approved by the ICC from time to time and in effect.

Advanced Metering and Telecommunications Equipment Service

Advanced Metering and Telecommunications Equipment Service hereunder is available to monthly balanced Customers upon request. Company shall not be required to provide daily interval usage information to Customer that does not elect this optional service. Prior to commencement of Advanced Metering and Telecommunications Equipment Service hereunder, Customer shall meet the requirements of Section 4C of the Standards and Qualifications For Gas Service tariff.

Customer shall be billed the charge shown immediately below for each meter to which advanced telecommunications equipment has been attached for the billing period.

Meter Data Access Fee	\$21.25 per meter
-----------------------	-------------------

RIDER T – TRANSPORTATION SERVICE
Applicable to Rate GDS-2, GDS-3, GDS-4, GDS-5, GDS-6 and GDS-7

2. The final pipeline transporter of such Customer-owned gas agrees to provide daily delivery data for such gas to the Company.

Company reserves the right to require usage of Customer-Owned Gas to be uniform over the day when a pipeline imposes a requirement on Company to accept Delivery of gas uniformly over the day. Company shall be entitled to bill and collect from Customer any penalties or fees charged by such pipeline attributable to such Customer's non-conformance with Company's direction to take Delivery uniformly over the day.

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Customer shall be billed the charge shown immediately below for each meter to which advanced telecommunications equipment has been attached for the billing period.

Meter Data Access Fee \$21.25 per meter

RIDER T - TRANSPORTATION SERVICE**Applicable to Rate GDS-2, GDS-3, GDS-4, GDS-5 and GDS-7**

2. The final pipeline transporter of such Customer-owned gas agrees to provide daily delivery data for such gas to the Company.

Company reserves the right to require usage of Customer-Owned Gas to be uniform over the day when a pipeline imposes a requirement on Company to accept Delivery of gas uniformly over the day. Company shall be entitled to bill and collect from Customer any penalties or fees charged by such pipeline attributable to such Customer's non-conformance with Company's direction to take Delivery uniformly over the day.

When service under this Rider is terminated, the cashout price for Customers Bank, if applicable, shall be the Chicago Citygate First of the Month price index as reported in "Inside FERC Gas Market Report" for the month following the end of Rider T service.

Service hereunder is subject to the Customer Terms and Conditions, Supplier Terms and Conditions, Standards and Qualifications for Gas Service, Tax Additions, and Supplemental Customer Charge Tariffs of this Schedule, as well as any other applicable Rates, Riders, taxes, adjustments, fees or charges that may be approved by the ICC from time to time and in effect.

Advanced Metering and Telecommunications Equipment Service

Advanced Metering and Telecommunications Equipment Service hereunder is available to monthly balanced Customers upon request. Company shall not be required to provide daily interval usage information to Customer that does not elect this optional service. Prior to commencement of Advanced Metering and Telecommunications Equipment Service hereunder, Customer shall meet the requirements of Section 4C of the Standards and Qualifications For Gas Service tariff.

Customer shall be billed the charge shown immediately below for each meter to which advanced telecommunications equipment has been attached for the billing period.

Meter Data Access Fee \$21.25 per meter

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 10

MidAmerican Energy Company – Telemetry Costs

Schedules RJH 10.2 – Iowa, Nebraska and South Dakota Costs

Schedule RJH 10.1

Haubensak, Richard

From: Chrisman, Tamara L [TLChrisman@midamerican.com]
Sent: Wednesday, October 07, 2009 10:49 AM
To: Haubensak, Richard
Subject: Estimated Telemetry Costs

Below are the 2009 Estimated Telemetry Costs for MidAmerican Energy by state:

Iowa - \$1,676.42

Nebraska - \$1,610.40

South Dakota - \$1,380.90

Please be aware that these costs may change due to each customer's individual site conditions.

It is not MidAmerican's policy to disclose information regarding purchasing information.

If you have any additional questions, please contact me. Thank you. TC

Tami Chrisman
Supv. Gas Transportation Billing
Gas Supply Operations
ph 712.277.7458
fax 712.252.7343
tlchrisman@midamerican.com

Schedule RJH 10.2

**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

Schedule RJH 11.1

**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

Ann M. Seha
Michael J. Ahern
Sarah J. Kerbeshian
DORSEY & WHITNEY LLP

50 South Sixth Street, Suite 1500
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600

Attorneys on Behalf of Minnesota
Energy Resources Corporation

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Schedule RJH 11.4

Ms. Hoffman Malueg's Rebuttal Testimony, which was offered in response to Mr. Haubensak's Direct Testimony, as Mr. Haubensak acknowledges,¹⁷⁹ 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."¹⁸⁰ 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.¹⁸¹ 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.¹⁸² 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.¹⁸³ 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.¹⁸⁴ An average small

¹⁷⁹ Tr. Vol. 2A at 64-65 (Haubensak).

¹⁸⁰ Ex. 34, Hoffman Malueg Rebuttal at 13.

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

¹⁸² Tr. Vol. 2A at 76-77 (Haubensak).

¹⁸³ Tr. Vol. 2A at 93-94 (Haubensak).

¹⁸⁴ Ex. 110, MPUC Staff Information Request No. 12.

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

SURREBUTTAL TESTIMONY

OF

RICHARD HAUBENSAK

ON BEHALF OF CONSTELLATION NEWENERGY-GAS DIVISION, LLC

SCHEDULE RJH 12

Kansas Gas Service Company Tariffs -- Telemetry

Schedules RJH 12.2 – 12.4 – Electronic Flow Measurement (EGM) Rider

Schedule RJH 12.1

KANSAS GAS SERVICE
A DIVISION OF ONEOK, INC.
(Name of Issuing Utility)

SCHEDULE EFMR

ALL RATE AREAS
(Territory to which schedule is applicable)

Replacing Schedule EFMR Sheet 1
which was filed September 22, 2003

No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 1 of 3 Sheets

ELECTRONIC FLOW MEASUREMENT RIDERAPPLICABILITY

Applicable to all customers served under rate schedules ST, GTK, GTt, LVTK, LVTt, WTK and WTt and located in and around the communities specified in the Index. Service is subject to the DEFINITIONS AND CONDITIONS section below.

NET MONTHLY BILL

\$ 25.00 per meter for each meter upon which Electronic Flow Measurement equipment (EFM) is installed, plus any charge to reimburse Company for the installed cost of the EFM.

DEFINITIONS AND CONDITIONS

1. EFM shall be required on all meters serving transportation accounts, except for the provisions of Definition and Condition #2 (below). Company shall install, operate, and own all EFM. Company shall provide and bill the customer the actual cost for any requested assistance beyond maintenance to Company's EFM and/or connection.
 - a. The requirements of this provision shall be judged to have been met pending a customer's sequential assignment to Company's EFM installation schedule.
 - b. Company may, at its sole discretion, waive the requirements of this provision for a customer which uses gas primarily during Company's off-peak season.
 - c. A customer which declines Company's EFM installation, or which does not provide a Contribution in Aid of Construction (CIAC), or which does not install and/or maintain an operable dedicated telephone circuit, all as required by this rider, shall be ineligible for transportation service. Company shall promptly notify a customer of the need to install or maintain an operable dedicated telephone circuit and may, 45 days after such notification, disqualify such customer from transportation service.

Issued	April	1	2005
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By	/S/		
	LARRY G. WILLER, DIRECTOR		

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April 14, 2005
/S/ Susan K. Duffy

THE STATE CORPORATION COMMISSION OF KANSAS

INDEX NO. 42.2

KANSAS GAS SERVICE
A DIVISION OF ONEOK, INC.
(Name of Issuing Utility)

SCHEDULE EFMRALL RATE AREAS

(Territory to which schedule is applicable)

Replacing Schedule EFMR Sheet 2
which was filed January 30, 2003

No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 2 of 3 SheetsELECTRONIC FLOW MEASUREMENT RIDER (Cont.)

2. RDQ Balancing: Notwithstanding the provisions above, according to the Required Daily Quantity (RDQ) Balancing provisions in Section 11 of Company's General Terms and Conditions for Gas Service (GT&C), a customer may agree to deliver during PODBs and/or POCs a predetermined Required Daily Quantity (RDQ) of natural gas to a transportation service meter which records a peak-month usage of less than 1,500 Mcf in the most recent 12 month period ending April 30, in lieu of the Company's requirement to install EFM. However, meters upon which EFM equipment has already been installed shall not be eligible for the RDQ Balancing option and the customer shall be subject to all charges set out in the Net Monthly Bill section.
3. A customer shall reimburse Company for the installed cost of EFM which shall become the sole property of Company. This CIAC for labor, material, and overhead costs associated with the installation shall be:

\$ 1,600 per meter	if the customer's existing measurement facilities do not require the use of an electronic correction device as part of the EFM, or
\$ 3,400 per meter	if the customer's existing measurement facilities include or require the use of an electronic correction device as part of the EFM.
4. A customer shall make an additional CIAC sufficient to cover the cost of any non-EFM related work performed and/or equipment installed at the customer's request. All such facilities and/or equipment shall become the sole property of Company. Payment shall be due from the customer at the time equipment is installed, except that Company may permit the customer to finance the EFM over a four year period at 8% per annum.
5. Company shall endeavor to coordinate the installation of all facilities required herein with a customer as soon as practicable following the effective date of this rider. Company shall notify the customer of its intent to install EFM, as well as the scope and estimated cost thereof.
 - a. A customer shall provide adequate space for the installation of the EFM.
 - b. A customer shall provide and maintain, at its cost, a dedicated telephone circuit or a Company-accepted alternative, according to Company's EFM Standards. Company and the customer shall mutually agree upon electric power and telephone connection location.

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THE STATE CORPORATION COMMISSION OF KANSAS

INDEX NO. 42.3

KANSAS GAS SERVICE
A DIVISION OF ONEOK, INC.
(Name of Issuing Utility)

SCHEDULE EFMR

ALL RATE AREAS

(Territory to which schedule is applicable)

Replacing Schedule EFMR Sheet 3
which was filed January 30, 2003

No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 3 of 3 SheetsELECTRONIC FLOW MEASUREMENT RIDER (Cont.)

- c. A customer's acceptance of Company's installation plan shall be assumed unless the customer declines in writing within 15 days of Company's notice. The customer shall, within 45 days of acceptance, complete the installation of the required telephone circuit, at the customer's own expense, after which time Company shall install EFM equipment.
6. When an EFM installation includes an electronic correction device, and at a customer's request, Company may provide a data link or contact closure meeting Company's Standards from Company's EFM to the customer at the meter site so the customer can receive data with the same type of output signal as Company. At the customer's request, Company shall inspect and evaluate the customer's connection during normal Company working hours.
7. Upon a customer's written request made prior to April 30 of each year, and agreement by Company given prior to May 31 of that same year and which shall not be unreasonably withheld, Company may credit 50% of assessed and paid Overrun Penalties incurred by the customer in the preceding winter heating season of November through March, to EFM. The credit shall be limited to the per meter CIAC required by Definition and Condition #2 (above). A credit for EFM is available only on new, Company-installed EFM and when Company is not assessed Overrun Penalties for a similar time period pursuant to a pipeline's authorized tariff.
8. In the event the EFM should fail, uncorrected mechanical readings shall be used to establish the estimated corrected read, except for orifice meter installations where historical data shall be used to estimate billing data.
9. A customer shall hold Company harmless from all claims for trespass, injury to persons, or damage to lawns, trees, shrubs, buildings or other property that may be caused by reason of the installation, operation, or replacement of the EFM or customer connection and other necessary equipment to serve the customer unless it shall be affirmatively proved that the injury to persons or damage to property complained of has been caused by willful default or negligence on the part of Company or its accredited personnel.
10. Service under this rider is subject to the provisions and applicable charges contained in Company's GT&C or successor documents, approved by the Commission.
11. All provisions of this rider are subject to changes made by order of the Commission.

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