



REC'D  
2014 NOV 24 PM 1 51

RECEIVED  
2014 NOV 21 PM 1 54  
NJ BPU  
MAILROOM

NJ BPU  
CASE MANAGEMENT

State of New Jersey

DIVISION OF RATE COUNSEL

140 EAST FRONT STREET, 4<sup>TH</sup> FL

P. O. Box 003

TRENTON, NEW JERSEY 08625

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

STEFANIE A. BRAND  
Director

November 19, 2014

**Via Electronic Mail and US Regular Mail**

Mary Patricia Keefe, Esq.  
Elizabethtown Gas Company  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 307922

Re: In the Matter of the Petition of Pivotal Utility Holdings, Inc. d/b/a  
Elizabethtown Gas to Revise the Remediation Adjustment Clause  
Component of its Societal Benefits Charge Rate  
BPU Docket No. GR14101135

Dear Ms. Keefe:

Enclosed please find the Division of Rate Counsel's discovery requests **RCR-A-1 through RCR-A-11** in the above-referenced matter.

Pursuant to N.J.A.C. 1:1-10.4, please respond to the requests and submit copies of the documents requested herein within fifteen (15) days or submit a schedule of reasonable compliance within fifteen (15) days from receipt of this letter.

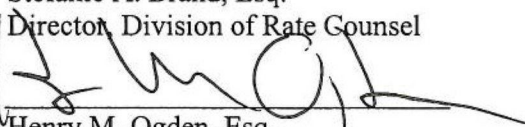
Please note that all discovery requests are of a continuing nature and should be updated, if necessary, over the course of the proceeding. Also, provide a designation on each response identifying the witness sponsoring the answer and finally, please provide the response on three-hole punch paper.

Your prompt handling of this request is appreciated. If you have any questions, please call me at (609) 984-1460.

Very truly yours,

Stefanie A. Brand, Esq.  
Director, Division of Rate Counsel

By:

  
Henry M. Ogden, Esq.  
Assistant Deputy Rate Counsel

HMO/sm  
c: Service List  
Enclosure

CMS RPA  
Legal(2) Energy(6)  
DAG

**In the Matter of the Petition of Pivotal Utility Holdings, Inc. d/b/a  
Elizabethtown Gas to Revise the Remediation Adjustment Clause Component  
of its Societal Benefits Charge Rate**

**BPU Docket No.: GR14101135**

**DIVISION OF RATE COUNSEL DISCOVERY REQUESTS**

RECEIVED  
2014 MAY 21 PM 1 54  
NJ BPU  
MAILROOM

- RCR-A-1. Please provide a worksheet showing all of the calculations and calculation components in support of the Company's claim that the proposed RAC rate increase increases the monthly bill of a typical residential heating customer using 100 therms by \$0.17, from \$100.65 to \$100.82, or an increase of 0.2% as compared to the Company's currently effective rates.
- RCR-A-2. Please confirm that the total remediation expenses of \$3,984,044 shown on Schedule SLC-1 do not include any late fees or late charges that are associated with legal costs recovered through the RAC. If such fees or charges are included, please identify the amount and indicate where on SLC-1 they are reflected.
- RCR-A-3. With regard to any internal labor costs included in the total remediation expenses of \$3,984,044 shown on Schedule SLC-1, please provide the following information:
- a. Identify the amount of such internal labor expenses and indicate where on SLC-1 they are reflected.
  - b. Indicate whether the internal labor expenses to be identified in response to part (a) include any incentive compensation expenses and, if so, quantify such incentive compensation.
  - c. Provide proof that the internal labor expenses to be identified in response to part (a) are indeed incremental to the labor expenses included in the Company's base rates.
  - d. Provide the Company's actual number of employees, in total and by employee category, for each of the months in 2014 through November.
  - e. Provide the average number of employees, in total and by employee category, that were included in the test year of the Company's most recent base rate case.
- RCR-A-4. Please provide a further update on the status of the Audit referenced in paragraph F of the Stipulation in the Company's prior RAC proceeding – BPU Docket No. GR13090839 and provide a description of all RAC-related practices and procedures, if any, required by the Board or agreed upon by Board Staff and the Company in connection with the Audit.

I/M/O the Petition of Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas to Revise The Remediation Adjustment Clause Component of Its Societal Benefits Charge Rate  
BPU Docket No.: GR14101135

RECEIVED  
2014 NOV 21 PM 1 55  
NJ BPU  
MAILROOM

Kristi Izzo, Secretary  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Stefanie A. Brand, Director  
Division of Rate Counsel  
140 East Front Street, 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Brian O. Lipman, Litigation Manager  
Division of Rate Counsel  
140 East Front Street, 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Felicia Thomas-Friel, Esq.  
Division of Rate Counsel  
140 East Front Street, 4<sup>th</sup> Floor  
P.O. Box 003  
Trenton, NJ 08625

Henry M. Ogden, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

James W. Glassen, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Chief Counsel  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Robert Catona  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Megan Lupo  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Jerome May, Director  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Henry Rich  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Robert Schultheis  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Scott Sumliner  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Beverly Tyndell  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Alex Moreau, DAG  
Division of Law  
124 Halsey Street, 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, NJ 07101

Babette Tenzer, DAG  
Division of Law  
124 Halsey Street, 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, NJ 07101

Steven Cook  
Elizabethtown Gas  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Thomas Kaufmann  
Elizabethtown Gas  
300 Cornell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Mary Patricia Keefe, Esq.  
Elizabethtown Gas  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Susan Potanovich  
Elizabethtown Gas  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Greg Corbett  
AGL Resources  
Ten Peachtree Place  
Atlanta, GA 30309

David Weaver  
AGL Resources  
Ten Peachtree Place  
Atlanta, GA 30309

Erica McGill  
AGL Resources  
Ten Peachtree Place  
Atlanta, GA 30309

Deborah Franco, Esq.  
Cullen and Dykman  
100 Quentin Roosevelt Blvd.  
Garden City, NY 11530

Kenneth T. Maloney, Esq.  
Cullen and Dykman, LLP  
1101 14<sup>th</sup> Street NW, Suite 550  
Washington, DC 20005

Mr. Robert J. Henkes  
Henkes Consulting  
7 Sunset Road  
Old Greenwich, CT 06870

RECEIVED  
2014 NOV 21 PM 1 56  
NJ BPU  
MAILROOM