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Arizona Corporation Commission
DOCKETED

MAY 27 2014

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IN THE MATTER OF
SOUTHWEST GAS CORPORATION
Docket No. G-01551A-13-0327

PREPARED DIRECT TESTIMONY
OF
EDWARD GIESEKING

ORIGINAL

ON BEHALF OF
SOUTHWEST GAS CORPORATION

May 27, 2014

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of
Prepared Direct Testimony
of
Edward Giesecking

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Appendix A – Summary of Qualifications of Edward Giesecking

Exhibit No.__(EG-1)

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BEFORE THE ARIZONA CORPORATION COMMISSION

Prepared Direct Testimony
of
Edward Giesecking

I. INTRODUCTION

Q. 1 Please state your name and business address.

A. 1 My name is Edward Giesecking. My business address is 5241 Spring Mountain Road, Las Vegas, Nevada 89150.

Q. 2 By whom and in what capacity are you employed?

A. 2 I am employed by Southwest Gas Corporation (Southwest Gas or the Company) in the Pricing and Tariffs department. My title is Director.

Q. 3 Please summarize your educational background and relevant business experience.

A. 3 My educational background and relevant business experience are summarized in Appendix A to this testimony.

Q. 4 Have you previously testified before any regulatory commission?

A. 4 Yes, I have previously testified before the Arizona Corporation Commission (ACC or Commission), Public Utilities Commission of Nevada, California Public Utilities Commission, and the Federal Energy Regulatory Commission.

Q. 5 What is the purpose of your prepared direct testimony in this proceeding?

A. 5 I will address matters regarding the Company's Arizona customer bill format and the application of the Monthly Weather Adjustment, or Monthly Component, of the Energy Efficiency Enabling Provision (EEP) of the Company's Arizona Gas Tariff.

Q. 6 Please summarize your prepared direct testimony.

1 A. 6 My prepared direct testimony consists of the following key issues:

- 2 • The calculation of the weather adjustment to customer bills is in
- 3 compliance with the Company's tariff.
- 4 • The development of the EEP and the related tariff.
- 5 • Efforts to address customer inquiries and the result of those efforts.
- 6 • The consistency of the process and method used to calculate the
- 7 monthly weather adjustment for each customer which results in all
- 8 customers receiving fair and equitable treatment.
- 9 • The rational and process that Southwest Gas employs when
- 10 modifying the presentation of its bills for service.

11

12 **II. MONTHLY WEATHER ADJUSTMENT**

13 Q. 7 When did Southwest Gas implement the monthly weather adjustment

14 mechanism?

15 A. 7 The monthly weather adjustment mechanism was approved as a component

16 of the EEP in the Company's last general rate case decision (Decision No.

17 72723) and was implemented January 2013 along with the revised rates

18 approved in the general rate case. The monthly weather adjustment

19 mechanism, in combination with the annual decoupling provision of the EEP,

20 ensures that the Company only recovers the Commission authorized margin

21 per customer.

22 Q. 8 What is the purpose of the monthly weather adjustment?

23 A. 8 While the overall purpose of the EEP is to ensure that the Company only

24 recovers the Commission authorized margin per customer, the monthly

25 weather adjustment provision also provides bill relief to customers during

26 times of colder than normal weather. It was also understood that when

27 weather was warmer than normal, such a mechanism would increase bills to

1 account for lower than normal gas consumption.

2 Q. 9 When did the Company bring the concept of a monthly weather adjustment
3 proposal to the Commission for consideration?

4 A. 9 The Company first proposed a margin decoupling mechanism, which
5 included decoupling from weather, in its 2004 general rate case. Then in its
6 2007 general rate case, the Company proposed a mechanism that contained
7 a monthly weather adjustment and an annual decoupling adjustment.
8 Pursuant to a Commission directive in its Order in the Company's 2007 rate
9 case, the parties participated in workshops to study decoupling options. The
10 Commission then conducted a rulemaking that resulted in a Commission
11 Policy Statement that addressed the Commission's position on decoupling.
12 The currently effective weather adjustment mechanism was proposed by the
13 Company in its 2011 rate case application where the proposal was
14 scrutinized by the rate case participants. The rate case did not go to hearing
15 as all but one of the rate case participants were able to negotiate a
16 settlement of the issues. However, it is noteworthy that the settling parties
17 presented settlement options to the Commission, with and without a monthly
18 weather adjustment mechanism, and the Commission approved the option
19 with the monthly weather adjustment mechanism.

20 Q. 10 Where does Southwest Gas gather the data to perform the monthly weather
21 adjustment?

22 A. 10 The weather adjustment calculation is based on the difference between the
23 actual weather and the normal weather during each customer's relevant
24 billing period. In order to perform the calculation and make the adjustment in
25 real time on the customer's current bill, the Company uses next-day actual
26 weather data provided by a commercial weather subscription service.

27 Q. 11 Does Southwest Gas make this weather data available to customers?

1 A. 11 Yes. The cumulative weather data used to compute the weather adjustment
2 is available in the Company billing records. The actual daily data that is
3 accumulated for each customer billing cycle can be obtained directly from
4 Southwest Gas upon request. In fact, this information has been provided to
5 Mr. Gayer every time he has requested.

6 Q. 12 Is this weather data available from any other source?

7 A. 12 Yes. Weather data is also available directly from the National Oceanic
8 Atmospheric Administration (NOAA). However, NOAA weather data for
9 some weather stations used in the calculation is sometimes not available until
10 several days after the weather day, and NOAA data may vary slightly from
11 the next-day commercial data.

12 Q. 13 In addition to the normal and actual weather data, what other information is
13 required to perform the weather adjustment calculation?

14 A. 13 To complete the weather adjustment calculation and analysis, the customer's
15 base load daily volume and recent two years winter billing consumption and
16 weather is also required.

17 Q. 14 Is this information available to customers?

18 A. 14 Yes. Southwest Gas provides this information to any customer upon request.
19 In fact, this information has been provided to Mr. Gayer every time he has
20 requested.

21 Q. 15 How is this information used by Southwest Gas in calculating the monthly
22 weather adjustment?

23 A. 15 This information is used to determine individual customer weather sensitive
24 gas use and to develop a correlation between weather and individual
25 customer gas consumption.

26 Q. 16 Is the monthly weather adjustment calculation included in the Company's
27 tariffs?

1 A. 16 Yes. The general nature of the mechanism, along with a high level
2 discussion of the process, is included in the Company's Arizona Gas Tariff
3 No. 7, Sheet Nos. 92-93.

4 Q. 17 Does Southwest Gas consider any secondary mechanics, or checks and
5 balances, to ensure that monthly weather adjustments account only for those
6 consumption variations that are associated with the weather during the
7 applicable billing cycle?

8 A. 17 Yes.

9 Q. 18 How does the Company utilize these secondary checks and balances?

10 A. 18 The purpose of the monthly weather mechanism is to adjust customer bills so
11 that customers' delivery service usage charges are what they would have
12 been if actual weather matched normal weather. If actual weather is colder
13 than normal and customer usage increases, there is a downward adjustment
14 to the usage portion of customer bills to replicate normal use. If actual
15 weather is warmer than normal, bills are adjusted upward.

16 To accomplish these adjustments the Company analyzes customer
17 consumption behavior as it relates to changes in weather by reviewing billing
18 data history and applying adjustments to current metered usage. However,
19 sometimes customer usage changes for reasons other than changes in
20 temperature and the correlation between usage and weather does not
21 accurately account for current billing changes. For example, a residential
22 customer who does not regularly use their pool heater might decide to heat
23 their pool for a special occasion. This would result in a large use of natural
24 gas that is not correlated with the difference between actual and normal
25 weather, which could then potentially result in a large weather adjustment on
26 the customer's bill that is not related to weather variations.

27 Therefore, to guard against these large unintended changes in

1 customer bills and to help ensure that the monthly weather adjustment is only
2 adjusting for weather sensitive changes in customer consumption, the
3 weather mechanism employs various checks and balances. For example,
4 downward adjustments when weather is colder than normal are limited to
5 metered volumes to prevent bills with negative usage. In addition, upward
6 adjustments are limited such that no customer adjustment will exceed the
7 metered usage. Yet another check and balance compares the current month
8 use calculation to a longer range statistical correlation, or regression
9 analysis, to look at the relationship between customers' usage and weather
10 over two winter seasons to ensure the Company is only adjusting bills to
11 account for differences in use related to deviations from normal weather.
12 While these checks and balances are not necessary components of the EEP,
13 the Company believes they help ensure that the monthly adjustments are
14 more reflective of changes in weather sensitive consumption.

15
16 **III. SOUTHWEST GAS' ENERGY EFFICIENCY ENABLING PROVISION**

17 Q. 19 Did Southwest Gas review other weather normalization tariffs when
18 developing its tariff proposal?

19 A. 19 Yes. The Company surveyed several tariffs prior to developing its tariff
20 proposal. While some tariffs contain detailed descriptions of their weather
21 calculations, others included little discussion of the weather normalization
22 process. Questar Gas, which has had a weatherization normalization
23 adjustment for nearly two decades, has one of the more detailed tariff
24 provisions. The Company's mechanism is very similar to Questar's and the
25 Southwest Gas tariff was drafted to closely match the Questar tariff.

26 Q. 20 Does the Questar tariff specifically mention any check and balance measures
27 that are employed to ensure that the weather normalization adjustment only

1 adjusts customer bills for deviations from normal weather?

2 A. 20 No.

3 Q. 21 Do you know whether Questar considers any secondary checks and
4 balances when determining the appropriate weather normalization
5 adjustment?

6 A. 21 Yes. Questar utilizes a regression analysis check when determining this
7 adjustment as well as adjustment limits to address situations where the
8 calculated weather adjustment exceeds logical bounds due to some anomaly.

9 Q. 22 Is it uncommon for utilities to have billing processes and provisions approved
10 in Commission Orders that are not detailed in its applicable tariffs?

11 A. 22 No. For example, the accounting and rate calculation for the Company's
12 Demand Side Management program surcharge and its Customer Owned
13 Yard Line replacement program are not explicitly mentioned or detailed in its
14 Arizona Gas Tariff. Another example is the calculation of the Southwest Gas
15 Monthly Gas Cost. While the process is generally discussed in the
16 Purchased Gas Cost Adjustment Provision, similar to the EEP, not all of the
17 details of the monthly gas cost calculation are described in the Company's
18 Arizona Gas Tariff.

19 Q. 23 Why didn't Southwest Gas specifically describe the secondary checks and
20 balances in its tariff?

21 A. 23 One of the challenges Southwest Gas faced in implementing the monthly
22 weather adjustment was to balance the presentation of information to its
23 customers in such a way that customers were adequately informed about the
24 mechanism, but were not presented with technical issues that misled and
25 confused them. It was determined that for tariff purposes a high level
26 discussion was more appropriate to introduce the concept and mechanism.
27 However, it was also recognized that some customers may want to know

1 more of the details and perhaps want to perform the calculations and analysis
2 themselves. As a result, when customers ask for additional details regarding
3 the calculations and analysis, the Company has always accommodated their
4 requests.

5 Q. 24 Is the Southwest Gas administration of its EEP, inclusive of the monthly
6 weather adjustment process, in compliance with its tariff?

7 A. 24 Yes. The overall purpose of the EEP is to ensure the Company only
8 recovers, on average, the Commission authorized margin per customer.
9 Within the EEP, the aim of the monthly weather mechanism is to adjust
10 customer bills during the winter months when actual weather is colder or
11 warmer than normal to replicate what customers would have used if weather
12 was normal. To accomplish this, customer bills are evaluated to estimate
13 weather sensitive consumption to minimize adjustments to only the weather
14 sensitive portion of customer bills. The Company employs a number of
15 techniques to accomplish this goal, with the understanding that ultimately the
16 annual decoupling adjustment component or the EEP will true-up to the
17 authorized margin amounts.

18
19 **IV. CUSTOMER RELATIONS AND EDUCATION**

20 Q. 25 What has the Company done to address customers who are interested in
21 obtaining additional information regarding the mechanism?

22 A. 25 The Company established a process to ensure that customers received
23 accurate information about the mechanism. First, the front-line customer
24 assistance representatives were provided background information and a high
25 level understanding of the mechanism that they could provide customers. In
26 the event a customer desired more information regarding the mechanism the
27 customers were referred to more senior, knowledgeable personnel. On the

1 rare occasion where the senior customer assistance representatives were
2 unable to adequately address the customer inquiry, a subject matter expert
3 would contact customers.

4 Q. 26 Was this approach successful?

5 A. 26 Yes. Southwest Gas is very pleased with the implementation of both the
6 monthly weather adjustment and annual revenue decoupling mechanisms
7 contained in the EEP of its Arizona Gas Tariff. As a measure of the
8 successful rate case implementation, including the weather mechanism, the
9 Company looked at the number of customer assistance calls after the most
10 recent general rate case Order compared to the number of calls after the
11 previous general rate case Order. The customer assistance calls were
12 dramatically lower after the most recent Order. It is also telling that
13 Southwest Gas has rendered millions of customer bills with weather
14 adjustments, yet has received only a handful of negative comments.

15 Q. 27 How did the Company assist Mr. Gayer in his effort to gain a greater
16 understanding of the monthly weather adjustment mechanism?

17 A. 27 It is my understanding that Mr. Gayer initially directed his questions to the
18 Company's customer assistance department, but did not get the information
19 that he was seeking. Following the protocol established to address customer
20 concerns, as previously detailed, he was contacted by a Company subject
21 matter expert. It was explained to Mr. Gayer that the monthly weather
22 calculations are done at the individual customer level and that the adjustment
23 requires real-time daily weather data for each customer's billing cycle, as well
24 as the 10-year average weather data used in the Company's Arizona general
25 rate case to establish customer volumes for rate design. Mr. Gayer was
26 provided a direct contact phone number and email address which he could
27 use if he had any additional inquiries. Subsequently, over the next three

1 months Mr. Gayer requested and was provided billing data and bill
2 calculations for his January, February and March 2013 service.

3 Q. 28 Did Mr. Gayer seek additional information from the Company after his March
4 2013 inquiry?

5 A. 28 No. When the Company did not hear from Mr. Gayer, the presumption was
6 that his questions and concerns had been addressed.

7 Q. 29 Is the Company willing to continue to work with Mr. Gayer to assist him in the
8 calculation of his monthly gas bills?

9 A. 29 Yes. Southwest Gas will work with any customer that requests assistance
10 with the calculation of their monthly Southwest Gas bill for as long as the
11 customer requests such assistance.

12
13 **V. NON-DISCRIMINATORY APPLICATION OF TARIFFS AND PROCEDURES**

14 Q. 30 Does Southwest Gas administer its tariffs and procedures such that
15 customers receive equitable treatment and avoid undue discrimination?

16 A. 30 Absolutely. The Company takes its responsibilities to treat all its customers
17 fairly and equitably very seriously and applies its tariffs and procedures
18 without discrimination. However, the application of tariffs and procedures
19 sometimes result in different treatment for different customers. For example,
20 an applicant for service must meet certain requirements before the Company
21 will initiate service. One of those requirements is the establishment of credit.
22 If the applicant meets certain creditworthiness conditions, they will not be
23 required to provide a deposit. However, if the applicant cannot meet the
24 conditions, they will be required to establish credit by providing a security
25 deposit to the Company.

26 Q. 31 Is there any dissimilar treatment or favoritism amongst customers regarding
27 the application of the Company's monthly weather adjustment?

1 A. 31 No. The monthly weather adjustment algorithm is applied identically to all
2 customers subject to the weather adjustment mechanism.

3

4 **VI. BILL FORMAT MODIFICATION**

5 Q. 32 Does the Company routinely make changes to its Arizona customer bill
6 format?

7 A. 32 No. In the past ten years, the Company has only changed its Arizona
8 customer bill format two times. Nonetheless, the Company periodically
9 reviews its business operations and interactions with its customers and
10 strives to employ industry “best practices” when those practices can be
11 integrated with the Company’s operations. Prior to the most recent change in
12 bill format, Southwest Gas’ bill format presented detailed calculations of
13 rates, including rate pro-rations when a customer’s rate changed within their
14 billing period. Displaying these calculations generated bills that oftentimes
15 resulted in customer confusion, which led to customer questions, many of
16 which came to the Commission’s Consumer Services Staff. Consequently,
17 Southwest Gas undertook a review of its bill presentation and how other
18 similarly situated utilities billed their customers.

19 Q. 33 How did the Southwest Gas bill compare to the other utilities that were
20 surveyed?

21 A. 33 The Southwest Gas bill was clearly much more complicated and harder to
22 understand compared to some of the other utilities. Attached as Exhibit
23 No.__(EG-1) are examples of bills from Arizona Public Service for electric
24 service, SemStream for propane service and Questar Gas for natural gas
25 service, none of which show the calculation of the line item charges. For
26 comparison, an example of a Southwest Gas bill prior to the most recent
27 format change is attached as Exhibit No.__(EG-2). After conducting its

1 review, the Company concluded that it should explore the modification of its
2 bill presentation.

3 Q. 34 Please explain the process that the Company used to develop its revised bill
4 format.

5 A. 34 Although the Company had been considering a change in its bill format as far
6 back as 2007, it began a best practices review in the later part of 2009. Once
7 the decision was made to simplify its bill format, the Company considered the
8 amount of detail it thought most appropriate for its billings. Ultimately, the
9 Questar Gas format was chosen as a model for the Southwest Gas bill.

10 In the early months of 2010, the Company discussed the proposed
11 change in bill format with its customer assistance managers to solicit
12 feedback on their customer interactions and their opinions on bill format
13 simplification. They overwhelmingly supported the overhaul of the Southwest
14 Gas bill to address issues that, in their experience, contributed to customer
15 confusion.

16 Next, the Company met with the ACC Consumer Services Staff (Staff)
17 to discuss the format changes and to solicit comment and input on the
18 Company's plan. Again, the feedback the Company received was positive.
19 In addition, the Staff provided recommendations addressing the
20 implementation of the changes. Staff recognized that there might be some
21 customers that would prefer the more detailed bill format and suggested that
22 the Company consider providing the option for customers to continue to
23 receive the detailed bill. Staff also suggested the Company provide notice to
24 its customers of the bill format change. Both of these recommendations were
25 implemented. A copy of the notification that was sent to all of Southwest
26 Gas' Arizona customers, including Mr. Gayer, is attached hereto as Exhibit
27 No.__(EG-3)

1 Once the Company made the necessary billing system programing
2 changes and prepared the customer education materials, it implemented the
3 change. The first bills with the new format were presented to customers
4 March 2011.

5 Q. 35 Do you agree with Mr. Gayer's allegation that the decision to simplify
6 customer bills was "[t]o prevent its customers from realizing that a new
7 charge had been added to their bills" (i.e. the monthly weather adjustment)?

8 A. 35 No. As discussed above, the Company had been considering a change in its
9 bill format as far back as 2007 due to the fact that the Southwest Gas bill was
10 much more complicated and harder to understand compared to some of the
11 other utilities. In fact, Southwest gas had made decoupling and weather
12 adjustment proposals as far back as its 2004 general rate case and yet again
13 in its 2007 rate case. There is simply no correlation between the Company's
14 bill format simplification and the 2011 rate case proposal to implement the
15 monthly weather adjustment.

16 Q. 36 Since implementation of the simplified bill, how many customers have
17 requested the more detailed bill format?

18 A. 36 Out of nearly 1 million customers served in Arizona, only 626 customers have
19 requested, and are provided with, a more detailed bill. Expressed in
20 mathematical terms, more than 99.9 percent of customers are satisfied with
21 the simplified bill format.

22 Q. 37 Did Southwest Gas ever receive a request from Mr. Gayer to be provided
23 with a more detailed bill?

24 A. 37 Yes. Southwest Gas received Mr. Gayer's request for a more detailed bill on
25 or about March 2012. Since that time, Southwest Gas has been consistently
26 providing Mr. Gayer with a more detailed bill.

27 Q. 38 Did the Company consider displaying the calculation of the weather

1 adjustment calculation on customer bills?

2 A. 38 Yes. Before the implementation of the simplified bill format, the Company
3 explored how a monthly weather adjustment could be portrayed on customer
4 bills. As part of that exploration, it looked at other utilities that utilize monthly
5 weather adjustments and did not find any utility that actually showed the
6 calculation on the bill. Some utilities show the adjustment in a line item while
7 others consolidate the adjustment with other billing elements. Ultimately,
8 Southwest Gas chose to follow the example of Questar Gas and consolidate
9 the weather adjustment with its usage charge, consistent with the Company's
10 decision to simplify its bills similar to Questar Gas.

11
12 **VII. CONCLUSION**

13 Q. 39 How would Southwest Gas summarize its experience with the EEP, in
14 particular the monthly weather adjustment mechanism?

15 A. 39 Since the implementation of the EEP beginning January 2012, the monthly
16 weather adjustment mechanism, combined with the annual decoupling
17 deferral, have directly benefited customers by 1) stabilizing winter bills and 2)
18 crediting to customers over \$11 million dollars. The Company is committed
19 to providing all information that it has regarding a customer's bill on a timely
20 basis to any customer that requests it. The Company has implemented
21 reasonable procedures to respond to customer inquiries about its various
22 billing process. As a result, Southwest Gas is of the firm belief that no
23 wholesale change to current process is warranted, especially given that the
24 Company has provided Mr. Gayer with all of the information he has
25 requested, including providing him with a detailed monthly bill.

26 Q. 40 Does this conclude your prepared direct testimony?

27 A. 40 Yes.

Appendix A-
Summary of Qualification of
Edward Giesecking

**SUMMARY OF QUALIFICATIONS
EDWARD GIESEKING**

I graduated from Sonoma State University in 1985 with a Bachelor of Arts degree in Business Management and from New Mexico State University in 1993 with a Master of Arts degree in Regulatory Economics.

From 1983 through 1993, I was employed by Pacific Gas and Electric Company in various capacities, including the position of Regulatory Analyst in the Revenue Requirements and Rates departments. My responsibilities as a Regulatory Analyst primarily involved the development of pricing structures and supporting rate requests before the California Public Utilities Commission.

I began my career with Southwest as a Specialist in the Rates department in 1993. I was assigned responsibility for monitoring and participating in California regulatory activity and reporting impacts to Company management. In 1995 I was promoted to Senior Specialist in the Regulatory Affairs department and subsequently promoted to Manager of the department in 1998. In addition to the day-to-day management of the department, my responsibilities included the supervision of regulatory filings to ensure timely and accurate submittals, and serving as the Company liaison with state regulatory agency and state consumer advocate professionals.

In August 2002, I was promoted to the position of Senior Manager of the Pricing and Tariffs department and in July 2003 was promoted to my current position.

Exhibit No. _(EG-1)

Exhibit No. _(EG-1)



Bill date: July 2, 2008

Summary of what you owe

Less	Amount due on previous bill	\$204.00
Less	Payments made on Jun 16, thank you	-\$204.00
Equals	Your balance forward	\$0.00
Plus	Your Equalizer payment due this month	\$204.00
Equals	Total	\$204.00

Your account number: 001234567
For service at:

Due date: July 16, 2008

Questions?

Call: 602-371-7171, 24 hours a day
Website: aps.com
Para servicio en español llame al:
602-371-6861 (Phoenix)

Your Equalizer Plan status	
Plan balance from your 06/03/2008 bill	\$41.46
Less your payment received	-\$204.00
Equals your Plan balance forward	-\$162.54
Plus this month's charge for electricity services	\$241.74
Equals your current Plan balance	\$79.20
Less this month's Equalizer payment	-\$204.00
Your new Equalizer Plan credit balance after payment will be	-\$124.80

• About your service plan

You've chosen the Time Advantage Plan. This gives you lower prices between 9 pm and 9 am weekdays and all day Saturday and Sunday. Try to schedule your use of major appliances for those periods.

• Help those in need

A dollar goes a long way to help those in need. Include your tax-deductible donation to SHARE with your bill payment or sign up to make a regular donation.

Page 1 of 3

See page 2 for more information

When paying in person, please bring bottom portion of this bill.



Your account number 001234567 Bill date July 2, 2008

Mailing address of phone number change? Check here and fill in the details on the back.

Total amount due \$ 204.00
Your optional contribution to SHARE: \$ _____
Total amount paid: \$ _____
Due date: Jul 16, 2008

Ways to pay your bill

- online at aps.com
- SurePay, our free direct debit service
- by phone with a credit or debit card (a third party convenience fee applies). Call: 1-866-261-2738
- in person at APS payment locations statewide – bring your entire bill with you. Visit aps.com for locations.

PHOENIX AZ 85004

02 R 1 25

000000097860228530200411120000008300000822201 000

- Page 2 -

Your electricity bill
Bill date: July 2, 2008

William Sample

Your account number: 001234567

Your service plan: Time Advantage 9pm-9am

Meter number: E03422
Meter reading cycle: 21

Charges for electricity services

Cost of electricity you used

Basic service charge	\$6.33
Delivery service charge	\$44.53
Environmental benefits surcharge	\$3.17
Federal environmental improvement surcharge	\$0.29
Competition rules compliance surcharge	\$0.61
System benefits charge	\$3.33
Power supply adjustment*	\$7.20
Metering *	\$4.95
Meter reading*	\$1.65
Billing*	\$1.86
Generation of electricity on-peak*	\$88.42
Generation of electricity off-peak*	\$21.24
Transmission and ancillary services*	\$9.36
Transmission cost adjustment*	\$0.85
Interim rate surcharge	\$4.07
Cost of electricity you used	\$197.86

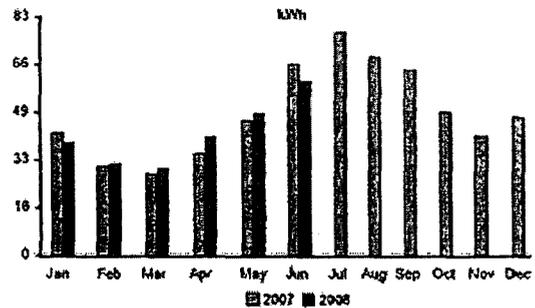
Amount of electricity you used

Meter reading on Jul 1	88639
Meter reading on May 30	86639
<hr/>	
Total electricity you used, in kWh	2000
<hr/>	
On-peak meter reading on Jul 1	78125
On-peak meter reading on May 30	77412
<hr/>	
On-peak electricity you used, in kWh	713
<i>(9am to 9pm Monday to Friday)</i>	
<hr/>	
Off-peak electricity you used, in kWh	1287
<i>(9pm to 9am weekdays and all day Saturday and Sunday)</i>	

Taxes and fees

Regulatory assesment	\$0.36
State sales tax	\$11.32
County sales tax	\$1.42
City sales tax	\$5.99
Franchise fee	\$5.46
Cost of electricity with taxes and fees	\$220.38
 Total charges for electricity services	 \$220.38

Average daily electricity use per month



*These services are currently provided by APS but may be provided by a competitive supplier.

Comparing your monthly use

	This month	Last month	This month last year
Billing days	32	29	29
Average outdoor temperature	91°	76°	90°
Your total use in kWh	2000	1579	2072
Percentage of on-peak use	36%	34%	52%
Your average daily cost	\$7.55	\$6.57	\$8.59



**Your Propane Gas Bill
For Service at:**

Bill Date: September 08, 2008
Past Due After: October 10, 2008

Your Propane Gas Bill

Summary of What You Owe

Billing \$ 23.12
Equals your Balance Forward \$ 23.12

Charges for your propane gas services

Basic Service Charge \$ 6.00

Cost of Propane you used

Fuel Surcharge \$ 0.67
Energy Usage \$ 8.08
Purchased Gas Adjuster \$ 6.07
Total Cost of Propane \$ 14.82
Cost of Propane \$ Per Therm \$ 2.22
Cost of Propane \$ Per Gal \$ 2.02

Taxes and fees

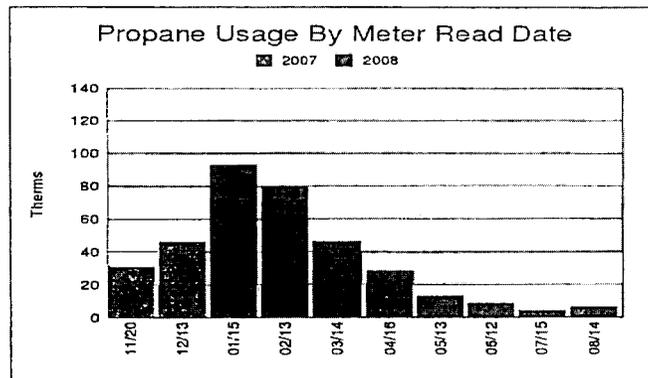
Town of Page Franchise Fee \$ 0.25
Regulatory Assessment \$ 0.02
State Tax \$ 1.42
City Tax \$ 0.63
Total Cost of Taxes and Fees \$ 2.32

Total Charges for Propane Services \$ 23.14

Total Balance Due \$ 46.26

Amount Due	
Total Due on 10/10/08	\$ 46.26
ZapPay Draft on 10/10/08	\$ 46.26

Customer Number: 000004
Account Number: 000000004
Rate Schedule: Residential



Comparing your monthly use	This Month	Last Month	Last Year
Billing Days	29	30	32
Your total use in therms	6.68	6.68	0.00
Average daily use (therms)	0.23	0.22	0.00

Services	Meter #	Billing Period			Days	Meter Reading in Cubic Feet			Read Type	Total Units
		From	To	Present		Previous	Usage			
Propane	0U574389	08/14/08	09/12/08	29	2363	2360	3	Regular	6.68 Therms	

As oil prices continue to hit new highs, PROPANE like gasoline, which are derived from oil continues to go up in cost. WATCH for our insert later this summer regarding projected Winter prices of PROPANE.

Please detach and return below portion with your payment. If paying in person, please bring entire bill. Please make sure return address (On front-right side of stub) shows through return address window

SEMSTREAM ARIZONA PROPANE LLC
2000 EAST FRONTAGE ROAD
PAGE, AZ 86040

Mailing Address or phone number change?
Check box, and write details on the back.

Service Address:
Questions about your bill please call 928.645.2391

PAGE AZ 860400000

IF PAYING BY CREDIT CARD, FILL OUT BELOW.		
<input type="checkbox"/> MasterCard	<input type="checkbox"/> VISA	
CARD NUMBER	EXP. DATE	
SIGNATURE		SECURITY CODE
ACCOUNT NUMBER	DUE DATE	AMOUNT DUE
000000004	10/10/08	\$ 46.26
CUSTOMER NUMBER	SHARE THE WARMTH contribution	AMOUNT PAID
000004	\$	\$

SEMSTREAM ARIZONA PROPANE LLC
(860402)
SEMSTREAM ARIZONA PROPANE LLC
2000 EAST FRONTAGE ROAD
PAGE, AZ 86040

Thank you for your patronage. Your prompt payment assists us in providing our customers with high-quality natural gas service.

Account Summary as of: January 16, 2012
 Previous Balance Due - 01/05/2012 42.15
 Payment Received - 1/5/2012 -42.15
Current Charges - Gas Service 46.53
Total Amount Due Upon Receipt \$ 46.53
 1% monthly interest (12% annually) charged on balance on or after 02/07/2012.

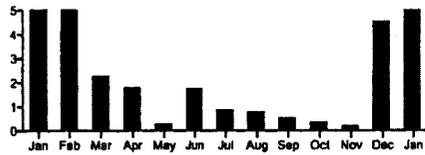
Service Address:
0.833991 0.003577 1122.710000 1167.500000

Residential Gas Service

Service Agreement: 8072980294

Comparison	Last Year	This Year
Decatherms/Day	0.17	0.16
Dollars/Day	\$1.72	\$1.50

DTH Usage History



Service from 12/14/2011 - 1/14/2012
Rate - GS

Charge for Gas Used (Avg cost per DTH \$ (7.49800)) 37.49
 Basic Service Fee Total 5.00
 Utah Sales Tax (3.35%) 1.42
 Municipal Energy Tax (6%)(Cedar City) 2.55
 Energy Assistance 0.07
Current Gas Billing 46.53

Meter ID	Current Meter Read		Previous Meter Read		Days	Dial Difference	Volume Multiplier	Billed DTH
	Date	Reading	Date	Reading				
36185629	1/14/2012	3344	12/13/2011	3289	32	55 CCF	0.091096	5.0

Questions, comments or mailing address corrections?
 Call Questar Gas weekdays 7am-7pm (see back of page for details) or visit our website: Questargas.com

Please write your account number on your check and return this portion with your payment.



Account	Current Charges Past Due After	Total Amount Due	Amount Enclosed
8072980334	2/7/2012	\$46.53	Bank Payment



Questar Gas Company
 PO Box 45841
 Salt Lake City, UT 84139-0001

Sign me up for a monthly REACH donation of: \$ _____

Exhibit No. _(EG-2)

Exhibit No. _(EG-2)



SOUTHWEST GAS CORPORATION

PO BOX 52075 MS 42A-002
PHOENIX, AZ 85072-2075

Customer Service:
(602) 861-1999
TDD/Deaf Device:
(602) 395-4142
Spanish/Espanol:
(602) 678-6796
www.swgas.com

PLEASE RETAIN THIS TOP PORTION FOR YOUR RECORDS

PHOENIX AZ 85025-2321



Service Address:
Rate Schedule: 110/G-5 RESIDENTIAL GAS SERVICE

Your Local Office is 10851 N BLACK CANYON HWY, PHOENIX AZ 85029

ACCOUNT NUMBER	CYCLE	DATE MAILED	PAST DUE AFTER	PLEASE PAY AMOUNT DUE	
421-0767786-022	12	01/22/02	02/11/02	\$137.81	
PREVIOUS BILLING:					
Previous Balance				113.90	
Payment(s) Since Last Bill - Thank You				113.90CR	
Balance Forward				\$0.00	
CURRENT BILLING: 31 Days					
Meter Reading					
Current	Previous	Billing			
Jan. 18	Dec. 18	Factor	Therms		
1379 -	1270 =	109 X .9924 =	108		
Average Rate					
Gas Usage	108 Therms	X .80500 =	86.94		
Rate Adjustment	108 Therms	X .06388 =	6.90		
Mo Gas Cost Adj	108 Therms	X .22212 =	23.99		
Basic Service Charge				8.00	
Applicable Revenue Taxes				11.98	
Current Bill				\$137.81	
Due date: 02/11/02 Amount due: \$137.81					
Important Messages:					
Your next meter read date is: Feb. 20, 2002					
Phoenix Weatherline 265-5550					
BEST WISHES FOR THE NEW YEAR FROM THE ENERGY SPECIALISTS AT SOUTHWEST GAS! THROUGHOUT THE YEAR, THE ANSWERS TO YOUR HOME ENERGY QUESTIONS ARE JUST A TOLL-FREE PHONE CALL AWAY. WHETHER YOU NEED NAMES OF RELIABLE CONTRACTORS IN YOUR AREA OR HELP CHOOSING A NEW HEATING SYSTEM, GIVE THE ENERGY SPECIALISTS A CALL AT 1-800-654-2765.					
Gas Usage History Information:					
	Therms / Days =	Avg Daily Therms	Avg Monthly Temperature		
This Month	108 / 31 =	3.48	56		
Last Month	88 / 32 =	2.75	54		
Last Year	83 / 30 =	2.77	54		
Previous Balance	Payments & Adjustments	Balance Forward	Current Bill	Current Balance	AMOUNT DUE
113.90	- 113.90	= 0.00	+ 137.81	= 137.81	\$137.81

PLEASE SEE REVERSE SIDE FOR RULES AND REGULATIONS • RETURN BOTTOM PORTION WITH PAYMENT



SOUTHWEST GAS CORPORATION

PO BOX 52075 MS 42A-002
PHOENIX, AZ 85072-2075

****- V O I D -****

ACCOUNT NUMBER	CYCLE	DATE MAILED	PAST DUE AFTER	AMOUNT DUE
421-0767786-022	12	01/22/02	02/11/02	\$137.81
				CA CK MO CC

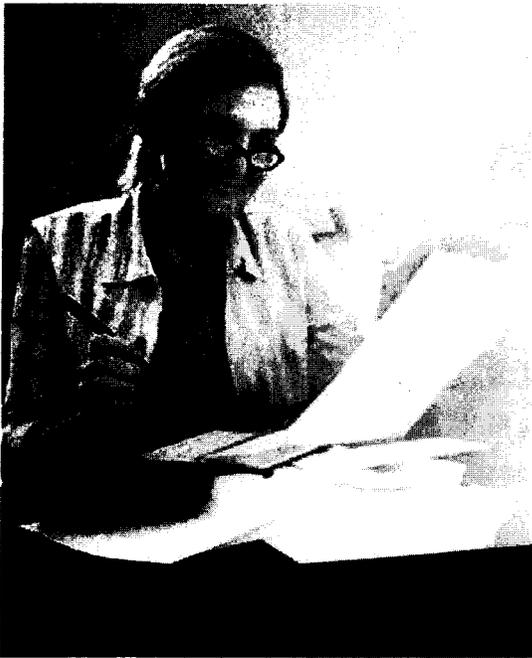
PHOENIX AZ 85023-2321

SOUTHWEST GAS CORPORATION
PO Box 98890
Las Vegas NV 89150-0101

421076778602260000137810000000008

This bill is now due and payable. Please make check payable to SWG and write account number on front of check or money order. Do not send cash through the mail or place cash in the night depository.

Exhibit No. _(EG-3)



How to read your Southwest Gas bill

You may have noticed that your bill has a different look this month. That's because we've reduced the number of line items on your bill to make it easier to read.

We've provided you with a sample bill that reflects some of the key elements of a standard residential bill.

It does not, however, represent your actual bill.



SOUTHWEST GAS



1. The Usage Charge is a per therm charge that recovers the costs of delivering natural gas which are not recovered in the Basic Service Charge, and the cost of natural gas purchased by Southwest Gas on behalf of our customers.

2. The Basic Service Charge is a per month charge that recovers a portion of the cost of delivering your natural gas.

3. The DOT Safety Surcharge recovers the cost of pipeline safety programs mandated by the Department of Transportation.

4. Applicable Revenue Taxes are the State and local government taxes Southwest Gas is required to collect from its customers. For Southwest's current Statement of Rates visit: http://www.swgas.com/tariffs/aztariff/rates/statement_of_rates.pdf

ACCOUNT NUMBER	CYCLE	DATE MAILED	PAST DUE AFTER	PLEASE PAY AMOUNT DUE
XXX-XXXXXXX-XXX	01	03/10/XX	03/29/XX	\$65.23
PREVIOUS BILLING:				64.70
Previous Balance				64.70CR
Payment(s) Since Last Bill				\$0.00
Balance Forward				
CURRENT BILLING:				
Meter Reading:	32 Days Current	Previous Feb. 02	Billing Factor	Total Therms
	Mar. 03	4057 = 70 X	.9757 =	68
	4127 -			54.34
				10.70
				0.05
				0.14
				\$65.23
Current Bill				
Due on or before: 03/29/XX			Amount due: \$65.23	

THIS IS A SAMPLE BILL. DO NOT PAY.

Usage Charges
Basic Service Charge
DOT Safety Surcharge
Applicable Revenue Taxes