

**Exhibit No. VN-2
Dockets UE-090704 and UG-090705
Witness: Vanda Novak**

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET UE-090704

DOCKET UG-090705

EXHIBIT TO TESTIMONY OF

VANDA NOVAK

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Company Response to Staff Data Request No. 186

November 17, 2009

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-090704 and UG-090705
Puget Sound Energy, Inc.'s
2009 General Rate Case**

WUTC STAFF DATA REQUEST NO. 186

WUTC STAFF DATA REQUEST NO. 186:

Re: Weather Normalization

On pages 8-9 of Ms. Molander's direct testimony, Exhibit (LIM-1T), she describes a modification to the 2006 weather normalization method for holiday variables and she concludes that that change "improves the coefficients on weather." (Page 9, Lines 3-4.) Please provide the analysis supporting that conclusion and a written narrative describing the analysis.

Response:

As described on pages 8-9 of the Prefiled Direct Testimony of Lorin I. Molander, Exhibit No. ___ (LIM-1T), "The Company made a minor change to the system model in how it estimates the temperature and load relationship on holidays. The model accounts for holidays specifically since there are other factors that contribute to load on those days that are not weather related. Previously, the model was specified so the non-weather factors that contribute to load were the same for all holidays." This change was also made to the gas system model (which includes separate equations for firm, interruptible, and transportation), as described on page 12 of Exhibit No. ___ (LIM-1T).

Attached as Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to WUTC Staff Data Request No. 186, please find an MS Excel file that contains regression results and statistics supporting the modification of the general holiday variable to specifying individual holidays in the electric and gas system models. Both regressions were run using the updated loads and temperatures for this proceeding, but the holidays are specified differently to examine the difference in effects to the model.

In general, econometric models relating daily loads and daily weather may specify a holiday variable (or variables) to account for the observed difference between energy use on holidays versus energy use on non-holidays that is unrelated to differences in weather. By accounting for the holiday impact on loads, the model is able to better specify the relationship between weather and load. The weather normalization methodology approved in PSE's 2006 general rate case ("GRC"), WUTC Docket Nos. UE-060266 and UG-060267, accounted for the holiday impact on load by including one

holiday dummy variable in the electric and gas system models. The resulting holiday coefficient estimated by the regression was the estimate of the impact on load for all holidays with no differentiation among holidays.

For this proceeding, PSE modified the specification of the holidays in the electric and gas system models. The holiday variable was broken out to represent individual holidays allowing the non-weather factors that affect load to vary for each major holiday (New Year's Day, Christmas Eve, Christmas Day, the day after Christmas, Fourth of July, Memorial Day, Labor Day, Thanksgiving Day, and the day after Thanksgiving Day).

Separating the general holiday dummy variable into a separate dummy variable for each major holiday is based on the theory that each holiday impacts loads differently. PSE tested this theory by running the regression specifying the individual holidays and reviewing the resulting regression statistics. Support for the use of specific holiday variables versus a general holiday variable rests on the following set of assumptions: 1) the majority of the specific holiday variables pass the test of significance, 2) the coefficients on holiday variables are notably different, and 3) overall, the coefficients on weather become better specified.

As can be seen on the 'Electric System UPC Equations' tab of Attachment A to PSE's Response to WUTC Staff Data Request No. 186, the majority of the coefficients on separate holiday variables in this proceeding's model are significant at the 5% level. The coefficients on the holiday variables are also notably different between holidays. Using the electric system model as an example, the coefficient on the Christmas Day variable is -6.063, greater than the estimated coefficient of -3.775 for the Christmas Eve variable.

It is expected that the ability of the model to attribute different coefficients to different holidays allows the weather coefficients to be better specified. The "Std. Error" column reports the estimated standard errors of the coefficient estimates. The standard errors measure the statistical reliability of the coefficient estimates—the larger the standard errors, the more statistical noise are in the estimates. Using the electric system model as an example, adding the standard errors of this proceeding's weather variables (i.e. PCD/PHD variables) gives a summed standard error of 1.729. For the 2006 GRC methodology (with updated information for this proceeding) the summed standard error of the weather variables is 1.753. The decrease in the summed standard error of 1.753 to 1.729 implies that this proceeding's methodology has improved the specification of the weather coefficients.

Additionally, adjusted R-Squared, a commonly referenced statistic used to measure how well the regression model has done at predicting values of the dependent variables with the provided exogenous variables, is higher in the 2009 model where the holidays are specified separately (0.978061 using separate holiday variables versus 0.977349 with one holiday variable).

**ATTACHMENT A to PSE's Response to
WUTC Staff Data Request No. 186**

Electric System Load (Use-per-Customer) Equation

2009.GRC.Revised.Methodology
Dependent Variable: Electric System Use-Per-Customer
Method: Least Squares
Date: 10/19/09 Time: 08:58
Sample: 1/01/2005 12/31/2008
Included observations: 1461
Convergence achieved after 21 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|--------------------|-------------|--------------------|-------------|-------|
| C | 56.450 | 1.613 | 35.017 | 0.000 |
| JAN | -1.315 | 2.123 | -0.620 | 0.536 |
| FEB | 0.550 | 2.648 | 0.208 | 0.836 |
| MAR | -1.537 | 1.980 | -0.776 | 0.438 |
| APR | -3.406 | 1.754 | -1.942 | 0.052 |
| MAY | -3.132 | 1.675 | -1.870 | 0.062 |
| JUN | -3.562 | 1.648 | -2.162 | 0.031 |
| JUL | -4.987 | 1.653 | -3.016 | 0.003 |
| AUG | -3.705 | 1.644 | -2.254 | 0.024 |
| SEP | -3.408 | 1.674 | -2.034 | 0.042 |
| OCT | -4.679 | 1.730 | -2.704 | 0.007 |
| NOV | -1.488 | 1.845 | -0.806 | 0.420 |
| JAN*PHD65 | 0.766 | 0.077 | 9.924 | 0.000 |
| JAN*PHD45 | 0.113 | 0.059 | 1.151 | 0.250 |
| FEB*PHD65 | 0.543 | 0.112 | 4.844 | 0.000 |
| FEB*PHD45 | 0.287 | 0.145 | 1.981 | 0.048 |
| MAR*PHD65 | 0.476 | 0.065 | 7.349 | 0.000 |
| MAR*PHD45 | 0.507 | 0.128 | 4.031 | 0.000 |
| APR*PHD65 | 0.384 | 0.039 | 9.887 | 0.000 |
| APR*PHD45 | 0.847 | 0.138 | 6.208 | 0.000 |
| MAY*PHD65 | 0.139 | 0.035 | 4.010 | 0.000 |
| SEP*PHD65 | 0.095 | 0.052 | 1.845 | 0.065 |
| OCT*PHD65 | 0.479 | 0.043 | 11.147 | 0.000 |
| OCT*PHD45 | 0.703 | 0.177 | 3.982 | 0.000 |
| NOV*PHD65 | 0.558 | 0.055 | 10.191 | 0.000 |
| NOV*PHD45 | 0.593 | 0.094 | 6.335 | 0.000 |
| DEC*PHD65 | 0.725 | 0.086 | 8.463 | 0.000 |
| DEC*PHD45 | 0.077 | 0.106 | 0.720 | 0.472 |
| JUN*PCD60 | 0.213 | 0.049 | 4.363 | 0.000 |
| JUL*PCD60 | 0.332 | 0.035 | 9.524 | 0.000 |
| AUG*PCD65 | 0.368 | 0.052 | 7.089 | 0.000 |
| SEP*PCD65 | 0.284 | 0.149 | 1.914 | 0.058 |
| WE | -4.293 | 0.081 | -52.933 | 0.000 |
| NDY | -1.604 | 0.827 | -2.557 | 0.011 |
| XMASDY | -3.775 | 0.851 | -4.238 | 0.000 |
| XWASDY | -6.083 | 0.709 | -8.582 | 0.000 |
| BOXDY | -2.589 | 0.872 | -3.855 | 0.000 |
| JULY4 | -4.832 | 0.588 | -8.221 | 0.000 |
| MEMDY | -3.719 | 0.589 | -6.310 | 0.000 |
| LABORDY | -3.156 | 0.593 | -5.321 | 0.000 |
| THNKSDY | -4.066 | 0.929 | -4.460 | 0.000 |
| THNKSDYFA | -2.232 | 0.625 | -3.568 | 0.000 |
| D121506 | -46.417 | 1.366 | -33.971 | 0.000 |
| D121606 | -23.302 | 1.539 | -15.144 | 0.000 |
| D121706 | -9.560 | 1.374 | -6.974 | 0.000 |
| AR(1) | 0.640 | 0.021 | 30.378 | 0.000 |
| R-squared | 0.578737 | Mean dependent v | 60.0858 | |
| Adjusted R-squared | 0.578061 | S.D. dependent var | 9.385509 | |
| S.E. of regression | 1.350239 | Akaike info crit | 3.527808 | |
| Sum squared resid | 2734.864 | Schwarz criterion | 3.694267 | |
| Log likelihood | -2531.06 | Hannan-Quinn crit | 3.589902 | |
| F-statistic | 1447.37 | Durbin-Watson sta | 2.077877 | |
| Prob(F-statistic) | 0 | | | |
| Inverted AR Roots | 0.64 | | | |

2009.GRC.Methodology
Dependent Variable: Electric System Use-Per-Customer
Method: Least Squares
Date: 10/19/09 Time: 08:58
Sample: 1/01/2005 12/31/2008
Included observations: 1461
Convergence achieved after 21 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|--------------------|-------------|--------------------|-------------|-------|
| C | 56.421 | 1.635 | 34.513 | 0.000 |
| JAN | -2.010 | 2.140 | -0.937 | 0.348 |
| FEB | 0.639 | 2.694 | 0.237 | 0.813 |
| MAR | -1.530 | 2.007 | -0.762 | 0.446 |
| APR | -3.402 | 1.776 | -1.915 | 0.056 |
| MAY | -3.105 | 1.696 | -1.831 | 0.067 |
| JUN | -3.513 | 1.668 | -2.106 | 0.035 |
| JUL | -4.940 | 1.674 | -2.950 | 0.003 |
| AUG | -3.656 | 1.665 | -2.196 | 0.028 |
| SEP | -3.358 | 1.695 | -1.981 | 0.048 |
| OCT | -4.647 | 1.753 | -2.651 | 0.008 |
| NOV | -1.730 | 1.871 | -0.924 | 0.355 |
| JAN*PHD65 | 0.819 | 0.077 | 10.671 | 0.000 |
| JAN*PHD45 | 0.047 | 0.058 | 0.483 | 0.629 |
| FEB*PHD65 | 0.543 | 0.114 | 4.752 | 0.000 |
| FEB*PHD45 | 0.292 | 0.148 | 1.973 | 0.049 |
| MAR*PHD65 | 0.479 | 0.066 | 7.279 | 0.000 |
| MAR*PHD45 | 0.508 | 0.128 | 3.978 | 0.000 |
| APR*PHD65 | 0.388 | 0.039 | 9.838 | 0.000 |
| APR*PHD45 | 0.846 | 0.139 | 6.089 | 0.000 |
| MAY*PHD65 | 0.140 | 0.035 | 3.978 | 0.000 |
| SEP*PHD65 | 0.097 | 0.052 | 1.854 | 0.064 |
| OCT*PHD65 | 0.481 | 0.044 | 11.019 | 0.000 |
| OCT*PHD45 | 0.698 | 0.180 | 3.885 | 0.000 |
| NOV*PHD65 | 0.569 | 0.056 | 10.243 | 0.000 |
| NOV*PHD45 | 0.584 | 0.095 | 6.167 | 0.000 |
| DEC*PHD65 | 0.719 | 0.087 | 8.278 | 0.000 |
| DEC*PHD45 | 0.091 | 0.108 | 0.847 | 0.397 |
| JUN*PCD60 | 0.213 | 0.050 | 4.298 | 0.000 |
| JUL*PCD60 | 0.329 | 0.035 | 9.312 | 0.000 |
| AUG*PCD65 | 0.370 | 0.053 | 7.009 | 0.000 |
| SEP*PCD65 | 0.291 | 0.151 | 1.931 | 0.054 |
| WE | -4.289 | 0.083 | -51.976 | 0.000 |
| HOLIDAY | -3.458 | 0.246 | -14.071 | 0.000 |
| D121506 | -46.431 | 1.381 | -33.581 | 0.000 |
| D121606 | -23.350 | 1.563 | -14.938 | 0.000 |
| D121706 | -9.641 | 1.398 | -6.895 | 0.000 |
| AR(1) | 0.628 | 0.021 | 29.556 | 0.000 |
| R-squared | 0.977923 | Mean dependent v | 60.0858 | |
| Adjusted R-squared | 0.977349 | S.D. dependent var | 9.385509 | |
| S.E. of regression | 1.412588 | Akaike info crit | 3.554339 | |
| Sum squared resid | 2839.463 | Schwarz criterion | 3.691899 | |
| Log likelihood | -2556.48 | Hannan-Quinn crit | 3.605685 | |
| F-statistic | 1703.639 | Durbin-Watson sta | 2.095173 | |
| Prob(F-statistic) | 0 | | | |
| Inverted AR Roots | 0.63 | | | |

Equation Variables Key
JAN, FEB, ... NOV = Monthly Dummy Variables
JAN*PHD65, FEB*PHD65, ... DEC*PHD65 = Monthly Heating Degree Days with a 65 F cut point
JAN*PHD45, FEB*PHD45, ... DEC*PHD45 = Monthly Heating Degree Days with a 45 F cut point
JUN*PCD60, JUL*PCD60 = Monthly Cooling Degree Days with a 60 F cut point
AUG*PCD65, SEP*PCD65 = Monthly Cooling Degree Days with a 65 F cut point
WE = Weekend Dummy Variable
HOLIDAY = Holiday Dummy Variable
NDY = New Years Day Dummy Variable
XMASDY = Christmas Eve Dummy Variable
BOXDY = Day after December 25 Dummy Variable
JULY4 = July 4th Dummy Variable
MEMDY = Memorial Day Dummy Variable
LABORDY = Labor Day Dummy Variable
THNKSDY = Thanksgiving Day = Dummy Variable
THNKSDYFA = Friday After Thanksgiving Dummy Variable
D(MM)(DD)(YY) = Daily Dummy Variable where (MM) is month, (DD) is day, and (YY) is year

Gas Firm Load (Use-per-Customer) Equation

2009 GRC Revised Methodology
 Dependent Variable: Gas Firm Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 11:36
 Sample: 1/01/2004 10/31/2008
 Included observations: 1766
 Convergence achieved after 11 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|-------------------|-------------|-------------------|-------------|-------|
| C | 10.051 | 16.359 | 0.614 | 0.539 |
| JAN | -0.029 | 0.302 | -0.095 | 0.926 |
| FEB | 0.993 | 0.362 | 1.086 | 0.278 |
| MAR | -0.778 | 0.285 | -3.055 | 0.002 |
| APR | -0.618 | 0.233 | -2.657 | 0.008 |
| MAY | -0.585 | 0.225 | -2.605 | 0.009 |
| JUN | -0.579 | 0.223 | -2.604 | 0.009 |
| JUL | -0.556 | 0.220 | -2.528 | 0.012 |
| AUG | -0.646 | 0.220 | -2.485 | 0.013 |
| SEP | -0.586 | 0.224 | -2.621 | 0.009 |
| OCT | -0.947 | 0.232 | -4.082 | 0.000 |
| NOV | -0.448 | 0.292 | -1.535 | 0.125 |
| NOV | 0.167 | 0.011 | 14.623 | 0.000 |
| JANHDD | 0.130 | 0.015 | 8.426 | 0.000 |
| FEBHDD | 0.167 | 0.008 | 22.266 | 0.000 |
| MARHDD | 0.130 | 0.005 | 25.203 | 0.000 |
| APRHDD | 0.095 | 0.005 | 18.696 | 0.000 |
| MAYHDD | 0.074 | 0.006 | 11.768 | 0.000 |
| JUNHDD | 0.073 | 0.007 | 10.393 | 0.000 |
| SEPHDD | 0.153 | 0.006 | 27.360 | 0.000 |
| OCTHDD | 0.157 | 0.011 | 14.910 | 0.000 |
| NOVHDD | 0.168 | 0.012 | 13.726 | 0.000 |
| DECHDD | 0.033 | 0.014 | 2.326 | 0.020 |
| JANHDD45 | 0.075 | 0.020 | 3.699 | 0.000 |
| FEBHDD45 | 0.034 | 0.017 | 2.054 | 0.040 |
| MARHDD45 | 0.130 | 0.022 | 6.008 | 0.000 |
| APRHDD45 | 0.050 | 0.016 | 3.211 | 0.001 |
| NOVHDD45 | 0.017 | 0.016 | 1.108 | 0.268 |
| DECHDD45 | -1.167 | 0.200 | -5.831 | 0.000 |
| D121506 | -0.075 | 0.012 | -6.109 | 0.000 |
| WE | -0.136 | 0.090 | -1.518 | 0.129 |
| IND_DAY | -0.265 | 0.093 | -1.335 | 0.182 |
| NEWYRDAY | -0.125 | 0.083 | -1.335 | 0.182 |
| XMAS EVE | -0.269 | 0.112 | -2.404 | 0.016 |
| XMAS_DAY | -0.457 | 0.111 | -4.129 | 0.000 |
| TRENDM | -0.004 | 0.008 | -0.513 | 0.608 |
| AR(1) | 0.518 | 0.022 | 23.817 | 0.000 |
| R-squared | 0.985984 | Mean dependent v | 3.07177 | |
| Adjusted R-s | 0.9857 | S.D. dependent va | 1.881632 | |
| S.E. of regres | 0.224997 | Akaike info crit | -0.12529 | |
| Sum squared | 87.57872 | Schwarz crit | -0.01365 | |
| Log likelihood | 146.6285 | Hannan-Quinn crit | -0.08404 | |
| F-statistic | 3477.1 | Durbin-Watson sta | 2.117339 | |
| Prob(F-statistic) | 0 | | | |
| Inverted AR R | 0.52 | | | |

2009 GRC Methodology
 Dependent Variable: Gas Firm Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 11:36
 Sample: 1/01/2004 10/31/2008
 Included observations: 1766
 Convergence achieved after 11 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|----------------|-------------|-------------------|-------------|-------|
| C | 10.673 | 16.331 | 0.654 | 0.513 |
| JAN | 0.003 | 0.303 | 0.009 | 0.993 |
| FEB | 0.435 | 0.364 | 1.193 | 0.233 |
| MAR | -0.738 | 0.285 | -2.900 | 0.004 |
| APR | -0.579 | 0.232 | -2.498 | 0.013 |
| MAY | -0.541 | 0.223 | -2.421 | 0.016 |
| JUN | -0.538 | 0.221 | -2.430 | 0.015 |
| JUL | -0.513 | 0.219 | -2.347 | 0.019 |
| AUG | -0.504 | 0.219 | -2.305 | 0.021 |
| SEP | -0.539 | 0.222 | -2.424 | 0.016 |
| OCT | -0.909 | 0.231 | -3.932 | 0.000 |
| NOV | -0.423 | 0.293 | -1.444 | 0.149 |
| NOV | 0.168 | 0.012 | 14.489 | 0.000 |
| JANHDD | 0.130 | 0.016 | 8.312 | 0.000 |
| FEBHDD | 0.130 | 0.008 | 22.014 | 0.000 |
| MARHDD | 0.131 | 0.005 | 24.976 | 0.000 |
| APRHDD | 0.096 | 0.005 | 18.672 | 0.000 |
| MAYHDD | 0.074 | 0.006 | 11.693 | 0.000 |
| JUNHDD | 0.073 | 0.007 | 10.331 | 0.000 |
| SEPHDD | 0.154 | 0.006 | 27.153 | 0.000 |
| OCTHDD | 0.159 | 0.011 | 14.842 | 0.000 |
| NOVHDD | 0.159 | 0.011 | 13.864 | 0.000 |
| DECHDD | 0.033 | 0.014 | 2.295 | 0.022 |
| JANHDD45 | 0.075 | 0.020 | 3.667 | 0.000 |
| FEBHDD45 | 0.034 | 0.017 | 2.041 | 0.041 |
| MARHDD45 | 0.130 | 0.022 | 6.932 | 0.000 |
| APRHDD45 | 0.049 | 0.016 | 3.114 | 0.002 |
| NOVHDD45 | 0.017 | 0.016 | 1.063 | 0.288 |
| DECHDD45 | -0.076 | 0.012 | -6.126 | 0.000 |
| WE | -0.107 | 0.038 | -2.864 | 0.004 |
| HOL | -0.005 | 0.008 | -0.555 | 0.579 |
| TRENDM | 0.511 | 0.022 | 23.438 | 0.000 |
| AR(1) | 0.511 | 0.022 | 23.438 | 0.000 |
| R-squared | 0.985598 | Mean dependent v | 3.07177 | |
| Adjusted R-s | 0.985341 | S.D. dependent va | 1.881632 | |
| S.E. of regre | 0.227808 | Akaike info crit | -0.10268 | |
| Sum square | 89.98831 | Schwarz crit | -0.00344 | |
| Log likelihood | 122.6624 | Hannan-Quinn crit | -0.06801 | |
| F-statistic | 3827.976 | Durbin-Watson sta | 2.107692 | |
| Prob(F-stat) | 0 | | | |
| Inverted AR | 0.51 | | | |

Equation Variables Key
 JAN, FEB, ..., NOV = Monthly Dummy Variables
 JANHDD, FEBHDD, ..., DECHDD = Monthly Heating Degree Days with a 65 F cut point
 JANHDD45, FEBHDD45, ..., DECHDD45 = Monthly Heating Degree Days with a 45 F cut point
 WE = Weekend Dummy Variable
 HOL = Holiday Dummy Variable
 NEWYRDY = New Years Day Dummy Variable
 XMAS EVE = Christmas Eve Dummy Variable
 XMAS_DAY = Christmas Day Dummy Variable
 IND_DAY = July 4th Dummy Variable
 D(MM)(DD)(YY) = Daily Dummy Variable where (MM) is month, (DD) is day, and (YY) is year

Note: The individual holidays included in the revised methodology model are those holidays found to be significant.

Gas Interruptible Load (Use-per-Customer) Equation

Revised Methodology (using separate holidays)
 Dependent Variable: Gas Interruptible Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 11:36
 Sample: 1/01/2004 10/31/2008
 Included observations: 1786
 Convergence achieved after 92 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|-------------------|-------------|-----------------------|-------------|-------|
| C | -50129.860 | 2737.638 | -18.311 | 0.000 |
| JAN | 44.656 | 33.167 | 1.346 | 0.178 |
| FEB | 44.162 | 37.805 | 1.168 | 0.243 |
| MAR | -55.349 | 33.411 | -1.657 | 0.098 |
| APR | -27.529 | 30.268 | -0.909 | 0.363 |
| MAY | -19.351 | 28.442 | -0.680 | 0.496 |
| JUN | -32.182 | 27.759 | -1.158 | 0.247 |
| JUL | -12.793 | 27.014 | -0.474 | 0.638 |
| AUG | -14.003 | 27.005 | -0.519 | 0.604 |
| SEP | -15.141 | 28.053 | -0.539 | 0.580 |
| OCT | -40.547 | 30.441 | -1.332 | 0.183 |
| NOV | -16.676 | 35.350 | -0.472 | 0.637 |
| JANHDD | 10.840 | 0.852 | 12.730 | 0.000 |
| FEBHDD | 10.959 | 1.216 | 9.009 | 0.000 |
| MARHDD | 15.200 | 1.057 | 14.375 | 0.000 |
| APRHDD | 13.749 | 0.900 | 15.268 | 0.000 |
| MAYHDD | 11.474 | 0.991 | 11.575 | 0.000 |
| JUNHDD | 12.207 | 1.193 | 10.228 | 0.000 |
| SEPHDD | 10.244 | 1.313 | 7.801 | 0.000 |
| OCTHDD | 14.418 | 1.090 | 13.227 | 0.000 |
| NOVHDD | 13.506 | 1.097 | 12.309 | 0.000 |
| DECHDD | 13.049 | 1.065 | 12.257 | 0.000 |
| WE | -76.135 | 3.037 | -25.067 | 0.000 |
| NEWYRDAY | -75.023 | 19.237 | -3.900 | 0.000 |
| XMAS_EVE | -100.287 | 22.891 | -4.399 | 0.000 |
| XMAS_DAY | -105.241 | 22.802 | -4.656 | 0.000 |
| IND_DAY | -49.975 | 18.738 | -2.667 | 0.008 |
| MEM_DAY | -55.174 | 18.826 | -2.931 | 0.003 |
| LAB_DAY | -47.678 | 18.805 | -2.535 | 0.011 |
| THKS_DAY | -121.575 | 22.169 | -5.484 | 0.000 |
| DYAFTHINKS | -111.161 | 25.589 | -4.344 | 0.000 |
| TRENDM | 25.112 | 1.365 | 18.398 | 0.000 |
| D010404 | -365.227 | 46.913 | -7.785 | 0.000 |
| D010504 | -639.320 | 50.393 | -12.689 | 0.000 |
| D010604 | -370.220 | 48.442 | -7.972 | 0.000 |
| D010405 | -567.097 | 44.851 | -12.644 | 0.000 |
| D010505 | -332.730 | 45.014 | -7.392 | 0.000 |
| AR(1) | 0.419 | 0.027 | 15.291 | 0.000 |
| R-squared | 0.9101853 | Mean dependent var | 379.3625 | |
| Adjusted R-sq | 0.9082724 | S.D. dependent var | 149.0955 | |
| S.E. of regress | 45.165908 | Akaike info criterion | 10.4794 | |
| Sum squared re | 3523488.8 | Schwarz criterion | 10.59724 | |
| Log likelihood | -5215.312 | Hannan-Quinn criter. | 10.52294 | |
| F-statistic | 473.3447 | Durbin-Watson stat | 1.833012 | |
| Prob(F-statistic) | 0 | | | |
| Inverted AR Co | 0.42 | | | |

2006.GRC Methodology
 Dependent Variable: Gas Interruptible Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 11:36
 Sample: 1/01/2004 10/31/2008
 Included observations: 1786
 Convergence achieved after 98 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|----------------|-------------|-----------------------|-------------|-------|
| C | -50070.344 | 2783.273 | -17.990 | 0.000 |
| JAN | 47.040 | 33.295 | 1.413 | 0.158 |
| FEB | 47.758 | 38.051 | 1.255 | 0.210 |
| MAR | -51.958 | 33.597 | -1.548 | 0.122 |
| APR | -24.447 | 30.415 | -0.804 | 0.422 |
| MAY | -16.126 | 28.548 | -0.565 | 0.572 |
| JUN | -29.238 | 27.910 | -1.048 | 0.285 |
| JUL | -9.250 | 27.093 | -0.341 | 0.733 |
| AUG | -11.015 | 27.105 | -0.406 | 0.685 |
| SEP | -11.141 | 28.180 | -0.395 | 0.693 |
| OCT | -37.077 | 30.591 | -1.212 | 0.226 |
| NOV | -10.734 | 35.590 | -0.302 | 0.763 |
| JANHDD | 10.843 | 0.861 | 12.593 | 0.000 |
| FEBHDD | 10.932 | 1.228 | 8.904 | 0.000 |
| MARHDD | 15.182 | 1.067 | 14.232 | 0.000 |
| APRHDD | 13.747 | 0.909 | 15.129 | 0.000 |
| MAYHDD | 11.501 | 1.000 | 11.503 | 0.000 |
| JUNHDD | 12.216 | 1.208 | 10.130 | 0.000 |
| SEPHDD | 10.200 | 1.327 | 7.685 | 0.000 |
| OCTHDD | 14.383 | 1.100 | 13.079 | 0.000 |
| NOVHDD | 13.241 | 1.104 | 11.990 | 0.000 |
| DECHDD | 13.174 | 1.072 | 12.295 | 0.000 |
| WE | -76.208 | 3.044 | -25.037 | 0.000 |
| HOL | -65.679 | 7.710 | -8.506 | 0.000 |
| TRENDM | 25.051 | 1.368 | 18.074 | 0.000 |
| D010404 | -363.553 | 47.195 | -7.703 | 0.000 |
| D010504 | -637.819 | 50.764 | -12.564 | 0.000 |
| D010604 | -389.256 | 46.737 | -7.901 | 0.000 |
| D010405 | -586.208 | 45.110 | -12.552 | 0.000 |
| D010505 | -331.837 | 45.276 | -7.329 | 0.000 |
| AR(1) | 0.425 | 0.027 | 15.590 | 0.000 |
| R-squared | 0.9086252 | Mean dependent var | 379.3625 | |
| Adjusted R | 0.9070452 | S.D. dependent var | 149.0955 | |
| S.E. of reg | 45.456957 | Akaike info criterion | 10.48881 | |
| Sum squar | 3585091.2 | Schwarz criterion | 10.58494 | |
| Log likelihood | -5230.616 | Hannan-Quinn criter. | 10.52493 | |
| F-statistic | 575.09106 | Durbin-Watson stat | 1.829994 | |
| Prob(F-stat | 0 | | | |
| Inverted A | 0.43 | | | |

Equation Variables Key
 JAN, FEB, ..., NOV = Monthly Dummy Variables
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 HOL = Holiday Dummy Variable
 NEWYRDY = New Years Day Dummy Variable
 XMAS_EVE = Christmas Eve Dummy Variable
 XMAS_DAY = Christmas Day Dummy Variable
 IND_DAY = July 4th Dummy Variable
 MEM_DAY = Memorial day Dummy Variable
 LAB_DAY = Labor day Dummy Variable
 THKS_DAY = Thanksgiving Day Dummy Variable
 DYAFTHINKS = Day After Thanksgiving Dummy Variable
 TRENDM = Linear Trend Variable
 D(MM)(DD)(YY) = Daily Dummy Variable where (MM) is month, (DD) is day, and (YY) is year

Note: The individual holidays included in the revised methodology model are those holidays found to be significant.

Gas Transportation Load (Use-per-Customer) Equation

Revised Methodology (using separate holidays)
 Dependent Variable: Gas Transportation Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 12:33
 Sample: 1/01/2004 10/31/2008
 Included observations: 1766
 Convergence achieved after 8 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|-------------------|-------------|-----------------------|-------------|-------|
| C | -167442.752 | 23852.177 | -5.906 | 0.000 |
| JAN | 300.036 | 235.697 | 1.267 | 0.209 |
| FEB | 737.078 | 265.223 | 2.800 | 0.005 |
| MAR | 452.200 | 235.650 | 1.919 | 0.055 |
| APR | 315.514 | 217.379 | 1.451 | 0.147 |
| MAY | 292.042 | 205.391 | 1.276 | 0.202 |
| JUN | 468.065 | 197.465 | 2.370 | 0.018 |
| JUL | 240.508 | 197.402 | 1.218 | 0.223 |
| AUG | 298.887 | 197.331 | 1.504 | 0.133 |
| SEP | 266.250 | 204.882 | 1.300 | 0.194 |
| OCT | 271.472 | 218.206 | 1.244 | 0.214 |
| NOV | 409.286 | 255.533 | 1.602 | 0.109 |
| JANHDD | 51.776 | 6.109 | 8.475 | 0.000 |
| FEBHDD | 33.228 | 7.935 | 4.188 | 0.000 |
| MARHDD | 46.320 | 6.866 | 6.866 | 0.000 |
| APRHDD | 45.953 | 5.818 | 7.898 | 0.000 |
| MAYHDD | 33.800 | 6.395 | 5.285 | 0.000 |
| SEPHDD | 27.283 | 9.240 | 2.953 | 0.003 |
| OCTHDD | 40.808 | 7.000 | 5.830 | 0.000 |
| NOVHDD | 33.281 | 7.522 | 4.424 | 0.000 |
| DECHDD | 47.544 | 7.260 | 6.549 | 0.000 |
| WE | -659.434 | 14.564 | -45.279 | 0.000 |
| NEWYRDAY | -797.198 | 111.481 | -7.151 | 0.000 |
| XMAS_EVE | -1035.689 | 135.821 | -7.625 | 0.000 |
| XMAS_DAY | -1225.698 | 153.699 | -7.976 | 0.000 |
| BOX_DAY | -264.052 | 135.678 | -1.946 | 0.052 |
| IND_DAY | -767.100 | 103.305 | -7.428 | 0.000 |
| MEM_DAY | -587.257 | 104.114 | -5.641 | 0.000 |
| LAB_DAY | -965.711 | 103.974 | -9.288 | 0.000 |
| THKS_DAY | -1421.683 | 128.060 | -11.278 | 0.000 |
| DYAFTHNKS | -825.959 | 145.596 | -5.673 | 0.000 |
| TRENDM | 85.322 | 14.133 | 6.037 | 0.000 |
| DO10404 | -2137.442 | 275.559 | -7.766 | 0.000 |
| DO10504 | -4000.765 | 310.535 | -12.883 | 0.000 |
| DO10604 | -2822.310 | 275.039 | -10.282 | 0.000 |
| DO10405 | -3291.822 | 259.921 | -12.664 | 0.000 |
| DO10505 | -2331.106 | 260.851 | -8.937 | 0.000 |
| AR(1) | 0.661 | 0.019 | 35.649 | 0.000 |
| R-squared | 0.85711263 | Mean dependent var | 4383.153 | |
| Adjusted R-squa | 0.85405312 | S.D. dependent var | 722.6588 | |
| S.E. of regressio | 276.077312 | Alaike info criterion | 14.10052 | |
| Sum squared res | 131705983 | Schwarz criterion | 14.21836 | |
| Log likelihood | -12412.761 | Hannan-Quinn criter. | 14.14406 | |
| F-statistic | 280.147055 | Durbin-Watson stat | 2.036139 | |
| Prob(F-statistic) | 0 | | | |
| Inverted AR Root | 0.66 | | | |

2006 GRC Methodology
 Dependent Variable: Gas Transportation Use-Per-Customer
 Method: Least Squares
 Date: 10/19/09 Time: 11:36
 Sample: 1/01/2004 10/31/2008
 Included observations: 1766
 Convergence achieved after 8 iterations

| Variable | Coefficient | Std. Error | t-Statistic | Prob. |
|--------------|-------------|-----------------------|-------------|-------|
| C | -167474.827 | 28117.950 | -5.958 | 0.000 |
| JAN | 331.620 | 238.660 | 1.390 | 0.165 |
| FEB | 769.782 | 265.680 | 2.897 | 0.004 |
| MAR | 481.381 | 237.264 | 2.028 | 0.043 |
| APR | 351.485 | 218.327 | 1.610 | 0.108 |
| MAY | 295.698 | 205.920 | 1.441 | 0.150 |
| JUN | 491.643 | 197.653 | 2.487 | 0.013 |
| JUL | 270.584 | 197.668 | 1.370 | 0.171 |
| AUG | 331.102 | 197.579 | 1.676 | 0.094 |
| SEP | 292.163 | 205.289 | 1.423 | 0.155 |
| OCT | 301.951 | 219.164 | 1.378 | 0.168 |
| NOV | 471.579 | 257.164 | 1.834 | 0.067 |
| JANHDD | 51.848 | 6.206 | 8.354 | 0.000 |
| FEBHDD | 33.184 | 8.097 | 4.099 | 0.000 |
| MARHDD | 46.496 | 6.888 | 6.750 | 0.000 |
| APRHDD | 45.959 | 5.939 | 7.739 | 0.000 |
| MAYHDD | 34.716 | 6.521 | 5.324 | 0.000 |
| SEPHDD | 27.244 | 9.397 | 2.889 | 0.004 |
| OCTHDD | 40.778 | 7.143 | 5.708 | 0.000 |
| NOVHDD | 31.135 | 7.645 | 4.073 | 0.000 |
| DECHDD | 48.604 | 7.350 | 6.613 | 0.000 |
| WE | -682.251 | 14.857 | -44.575 | 0.000 |
| HOL | -829.832 | 44.972 | -18.452 | 0.000 |
| TRENDM | 85.322 | 14.017 | 6.037 | 0.000 |
| DO10404 | -2141.910 | 282.080 | -7.583 | 0.000 |
| DO10504 | -4009.082 | 317.363 | -12.632 | 0.000 |
| DO10604 | -2828.682 | 281.488 | -10.049 | 0.000 |
| DO10405 | -3302.221 | 266.289 | -12.401 | 0.000 |
| DO10505 | -2341.858 | 267.245 | -8.763 | 0.000 |
| AR(1) | 0.651 | 0.019 | 34.669 | 0.000 |
| R-squared | 0.85027226 | Mean dependent var | 4383.153 | |
| Adjusted R | 0.84777105 | S.D. dependent var | 722.6588 | |
| S.E. of reg | 281.956385 | Alaike info criterion | 14.13622 | |
| Sum squar | 138010984 | Schwarz criterion | 14.23126 | |
| Log likeliho | -12454.051 | Hannan-Quinn criter. | 14.1726 | |
| F-statistic | 339.944073 | Durbin-Watson stat | 2.041633 | |
| Prob(F-stat | 0 | | | |
| Inverted A | 0.65 | | | |

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