

**EXHIBIT NO. ___(JKP-11)
DOCKET NO. UE-11___/UG-11___
2011 PSE GENERAL RATE CASE
WITNESS: JANET K. PHELPS**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

**Docket No. UE-11___
Docket No. UG-11___**

**TENTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED DIRECT TESTIMONY OF
JANET K. PHELPS
ON BEHALF OF PUGET SOUND ENERGY, INC.**

JUNE 3, 2011

Puget Sound Energy
2011 Gas General Rate Case
Comparison of Residential Basic Charges of Gas Distribution Companies

Line	Utility	State	Charge	Percentile
1	Missouri Gas Energy	MO	\$ 26.88	100.0%
2	Duke Energy Ohio	OH	\$ 25.33	99.5%
3	Atmos Energy Corp. (Missouri Northeast)	MO	\$ 22.68	99.1%
4	Maine Natural Gas	ME	\$ 22.13	98.6%
5	Delta Natural Gas Company Inc	KY	\$ 20.90	98.1%
6	Atmos Energy Corp. (Missouri West)	MO	\$ 20.17	97.7%
7	AmerenIP	IL	\$ 19.57	97.2%
8	Laclede Gas	MO	\$ 19.50	96.7%
9	Peoples Gas Light and Coke Company	IL	\$ 19.50	96.7%
10	AmerenCIPS	IL	\$ 19.31	95.8%
11	Central Florida Gas Co., Div. Chesapeake Utilities	FL	\$ 19.00	95.3%
12	Central Hudson Gas & Electric	NY	\$ 19.00	95.3%
13	Vermont Gas Systems, Inc.	VT	\$ 18.67	94.4%
14	North Shore Gas Company	IL	\$ 18.66	94.0%
15	Xcel Energy	ND	\$ 18.48	93.5%
16	Vectren Energy Delivery of Ohio	OH	\$ 18.37	93.0%
17	Black Hills/Iowa Gas Utility Company, LLC	IA	\$ 18.25	92.6%
18	Clearwater Gas System (Pasco)	FL	\$ 18.00	92.1%
19	Niagara Mohawk Power Corporation dba National Grid (1)	NY	\$ 17.85	91.6%
20	Columbia Gas of Ohio, Inc.	OH	\$ 17.81	91.2%
21	Dominion East Ohio	OH	\$ 17.58	90.7%
22	National Grid	NH	\$ 17.16	90.2%
23	Orange & Rockland (1)	NY	\$ 16.94	89.8%
24	Consolidated Edison Co. of NY, Inc. (1)	NY	\$ 16.80	89.3%
25	National Fuel Gas	NY	\$ 16.61	88.8%
26	The Empire District Gas Co.	MO	\$ 16.50	88.4%
27	Rochester Gas & Electric Corporation (1)	NY	\$ 16.30	87.9%
28	New York State Electric & Gas Corporation (1)	NY	\$ 16.30	87.9%
29	Black Hills/Kansas Gas Utility Company, LLC	KS	\$ 16.00	87.0%
30	Duke Energy Kentucky	KY	\$ 16.00	87.0%
31	Atmos Energy Corp. (Mid-Texas Division) (2)	TX	\$ 16.00	87.0%
32	AmerenCILCO	IL	\$ 15.60	85.6%
33	Atmos Energy Corp. (KS)	KS	\$ 15.50	85.1%
34	Citizens Gas Fuel Company (3)	MI	\$ 15.50	85.1%
35	Corning Natural Gas Corporation (1)	NY	\$ 15.25	84.2%
36	AmerenUE (Union Electric Co)	MO	\$ 15.00	83.7%
37	Cheyenne Light, Fuel & Power Company	WY	\$ 15.00	83.7%
38	The Energy Cooperative	OH	\$ 15.00	83.7%
39	SourceGas LLC (Gillett)	WY	\$ 15.00	83.7%
40	SourceGas LLC (Torrington)	WY	\$ 15.00	83.7%
41	SourceGas LLC (Casper)	WY	\$ 15.00	83.7%
42	National Grid (Long Island) (1)	NY	\$ 14.90	80.9%
43	Chattanooga Gas (4)	TN	\$ 14.50	80.5%
44	Ohio Valley Gas Corporation	OH	\$ 14.50	80.5%
45	Columbia Gas of Virginia	VA	\$ 14.25	79.5%
46	Atmos Energy Corp. (Missouri Southeast)	MO	\$ 13.75	79.1%
47	City of Las Cruces	NM	\$ 13.75	79.1%
48	Metropolitan Utilities District	NE	\$ 13.72	78.1%
49	NICOR	IL	\$ 13.55	77.7%
50	ENSTAR Natural Gas Co.	AK	\$ 13.50	77.2%
51	Yankee Gas Services	CT	\$ 13.50	77.2%
52	Equitable Gas	PA	\$ 13.25	76.3%
53	UGI Central Pennsylvania Gas, Inc.	PA	\$ 13.25	76.3%
54	UGI Pennsylvania Natural Gas, Inc.	PA	\$ 13.25	76.3%
55	Atmos Energy - LGS	LA	\$ 13.20	74.9%
56	Bangor Gas Company	ME	\$ 13.10	74.4%
57	Connecticut Natural Gas Corp.	CT	\$ 13.00	74.0%

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Line	Utility	State	Charge	Percentile
58	Atmos Energy - Trans LA	LA	\$ 13.00	74.0%
59	Baltimore Gas and Electric Company (BGE)	MD	\$ 13.00	74.0%
60	CenterPoint Energy (Oklahoma)	OK	\$ 13.00	74.0%
61	Chesapeake Utilities Corp	DE	\$ 13.00	74.0%
62	Southern CT Gas Co.	CT	\$ 13.00	74.0%
63	Richmond Utilities Board	KY	\$ 12.97	71.2%
64	Arkansas Oklahoma Gas Corporation (AOG)	OK	\$ 12.83	70.7%
65	Roanoke Gas Company	VA	\$ 12.74	70.2%
66	SourceGas LLC	NE	\$ 12.73	69.8%
67	Atmos Energy Corp. (KY)	KY	\$ 12.50	69.3%
68	Atmos Energy Corp. (TN) (4)	TN	\$ 12.50	69.3%
69	Kokomo Gas & Fuel	IN	\$ 12.50	69.3%
70	Louisville Gas and Electric Co.	KY	\$ 12.50	69.3%
71	Columbia Gas of Kentucky, Inc.	KY	\$ 12.35	67.4%
72	Fort Pierce Utilities Authority	FL	\$ 12.32	67.0%
73	Atmos Energy Corp. (GA)	GA	\$ 12.30	66.5%
74	Kansas Gas Service	KS	\$ 12.25	66.0%
75	Columbia Gas of Pennsylvania	PA	\$ 12.25	66.0%
76	Montana-Dakota Utilities Co	WY	\$ 12.17	65.1%
77	Black Hills/Nebraska Gas Utility Company, LLC (Lincoln)	NE	\$ 12.00	64.7%
78	Black Hills/Nebraska Gas Utility Company, LLC (Metro)	NE	\$ 12.00	64.7%
79	Black Hills/Nebraska Gas Utility Company, LLC (Outstate)	NE	\$ 12.00	64.7%
80	National Fuel Gas	PA	\$ 12.00	64.7%
81	National Grid	RI	\$ 12.00	64.7%
82	Philadelphia Gas Works	PA	\$ 12.00	64.7%
83	TECO Peoples Gas System	FL	\$ 12.00	64.7%
84	PECO	PA	\$ 11.75	61.4%
85	Mt. Carmel Public Utility Company	IL	\$ 11.50	60.9%
86	SEMCO ENERGY (B.C. Division)	MI	\$ 11.50	60.9%
87	SEMCO ENERGY (M.P.S.C. Division)	MI	\$ 11.50	60.9%
88	Berkshire Gas Company	MA	\$ 11.39	59.5%
89	CenterPoint Energy (Southern Louisiana)	LA	\$ 11.25	59.1%
90	Indiana Gas Co	IN	\$ 11.25	59.1%
91	Piedmont Natural Gas, Inc. (4)	TN	\$ 11.25	59.1%
92	Oklahoma Natural Gas	OK	\$ 11.20	57.7%
93	Delmarva Power	DE	\$ 11.03	57.2%
94	Citizens Gas (Marion County)	IN	\$ 11.00	56.7%
95	Florida Public Utilities Company	FL	\$ 11.00	56.7%
96	Michigan Gas Utilities	MI	\$ 11.00	56.7%
97	Peoples Natural Gas	PA	\$ 11.00	56.7%
98	Southern Indiana Gase & Electric Co	IN	\$ 11.00	56.7%
99	Atlanta Gas Light	GA	\$ 11.00	56.7%
100	Northern Indiana Public Service Co	IN	\$ 11.00	56.7%
101	Columbia Gas of Maryland	MD	\$ 10.97	53.5%
102	Bay State Gas	MA	\$ 10.94	53.0%
103	Okaloosa Gas District	FL	\$ 10.80	52.6%
104	Southwest Gas Corporation	AZ	\$ 10.70	52.1%
105	Xcel Energy (Colorado)	CO	\$ 10.64	51.6%
106	Consumers Energy	MI	\$ 10.50	51.2%
107	Entergy New Orleans	LA	\$ 10.50	51.2%
108	Valley Energy, Inc.	PA	\$ 10.50	51.2%
109	DTE Energy - MichCon (Michigan Consolidated Gas Co.)	MI	\$ 10.50	51.2%
110	City of Corpus Christi	TX	\$ 10.47	49.3%
111	City of Richmond, Department of Public Utilities	VA	\$ 10.40	48.8%
112	Madison Gas and Electric Company	WI	\$ 10.25	48.4%
113	Xcel Energy (Wisconsin)	WI	\$ 10.25	47.9%
114	Washington Gas Light Company	MD	\$ 10.20	47.4%

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115	Florida City Gas (3)	FL	\$ 10.13	47.0%
116	New England Gas Company	MA	\$ 10.01	46.5%
117	National Grid (Boston Gas)	MA	\$ 10.00	46.0%
118	Atmos Energy Corporation (CO)	CO	\$ 10.00	46.0%
119	Black Hills/Colorado Gas Utility Company, LP	CO	\$ 10.00	46.0%
120	CenterPoint Energy (Northern Louisiana)	LA	\$ 10.00	46.0%
121	City of Charlottesville, Public Utilities Division	VA	\$ 10.00	46.0%
122	Clearwater Gas System (Pinellas)	FL	\$ 10.00	46.0%
123	Memphis Light, Gas and Water	TN	\$ 10.00	46.0%
124	Piedmont Natural Gas, Inc.	NC	\$ 10.00	46.0%
125	Puget Sound Energy	WA	\$ 10.00	46.0%
126	Questar Gas Co	WY	\$ 10.00	46.0%
127	SourceGas LLC (Colorado)	CO	\$ 10.00	46.0%
128	UniSource Energy Services, UNS Gas, Inc.	AZ	\$ 10.00	46.0%
129	National Grid (Essex Gas)	MA	\$ 10.00	46.0%
130	Interstate Power and Light	IA	\$ 10.00	40.0%
131	NM Gas Co.	NM	\$ 9.95	39.5%
132	Arkansas Oklahoma Gas Corporation (AOG)	AR	\$ 9.90	39.1%
133	Atmos Energy Corp. (IL)	IL	\$ 9.90	39.1%
134	Virginia Natural Gas, Inc.	VA	\$ 9.78	38.1%
135	CenterPoint Energy (Arkansas)	AR	\$ 9.75	37.7%
136	Easton Utilities	MD	\$ 9.65	37.2%
137	Gainesville Regional Utilities	FL	\$ 9.52	36.7%
138	Northern Utilities	NH	\$ 9.50	36.3%
139	Wisconsin Gas	WI	\$ 9.43	35.8%
140	Arkansas Western Gas Company	AR	\$ 9.40	35.3%
141	CenterPoint Energy (Mississippi)	MS	\$ 9.30	34.9%
142	Colorado Springs Utilities	CO	\$ 9.28	34.4%
143	Wisconsin Power and Light Co.	WI	\$ 9.20	34.0%
144	Montana-Dakota Utilities Co	ND	\$ 9.13	33.5%
145	Atmos Energy Corp. (VA)	VA	\$ 9.00	33.0%
146	Lexington Utilities	NC	\$ 9.00	33.0%
147	Orwell Natural Gas Company	OH	\$ 9.00	33.0%
148	Southwest Gas Corporation (Northern Nevada)	NV	\$ 9.00	33.0%
149	Southwest Gas Corporation (Southern Nevada)	NV	\$ 9.00	33.0%
150	Xcel Energy (Minnesota)	MN	\$ 9.00	33.0%
151	Dominion Hope	WV	\$ 8.99	30.2%
152	South Jersey Gas Co.	NJ	\$ 8.92	29.8%
153	Piedmont Natural Gas, Inc. (4)	SC	\$ 8.83	29.3%
154	Chesapeake Utilities Corp	MD	\$ 8.75	28.8%
155	UGI Utilities, Inc.	PA	\$ 8.55	28.4%
156	Fitchburg Gas and Electric Light Company	MA	\$ 8.50	27.9%
157	The Gas Company, LLC	HI	\$ 8.50	27.9%
158	Equitable Gas	WV	\$ 8.50	27.9%
159	NVEnergy (Sierra Pacific Power)	NV	\$ 8.50	27.9%
160	New Jersey Natural Gas Co	NJ	\$ 8.25	26.0%
161	Atmos Energy Corp. (West-Texas Division) (5)	TX	\$ 8.21	25.6%
162	Entergy Gulf States	LA	\$ 8.08	25.1%
163	Appalachian Natural Gas Distribution	VA	\$ 8.00	24.7%
164	CenterPoint Energy (Minnesota)	MN	\$ 8.00	24.7%
165	Elizabethtown Gas	NJ	\$ 8.00	24.7%
166	Greenville Utilities	NC	\$ 8.00	24.7%
167	Mountaineer Gas Company	WV	\$ 8.00	24.7%
168	NorthWestern Energy	NE	\$ 8.00	24.7%
169	National Grid (Colonial - Cape)	MA	\$ 8.00	24.7%
170	National Grid (Colonial Gas - Lowell)	MA	\$ 8.00	24.7%
171	Atmos Energy Corp. (IA)	IA	\$ 7.95	20.9%

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172	Washington Gas Light Company - DC	DC	\$ 7.95	20.9%
173	Frontier Natural Gas	NC	\$ 7.74	20.0%
174	Valley Energy, Inc.	NY	\$ 7.62	19.5%
175	Montana-Dakota Utilities Co	SD	\$ 7.61	19.1%
176	Clarke-Mobile Counties Gas District	AL	\$ 7.50	18.6%
177	Equitable Gas	KY	\$ 7.50	18.6%
178	Northern Indiana Fuel & Light	IN	\$ 7.50	18.6%
179	Minnesota Energy Resources	MN	\$ 7.25	17.2%
180	CoServ Gas, Ltd.	TX	\$ 7.00	16.7%
181	Middle Tennessee Natural Gas Utility District	TN	\$ 7.00	16.7%
182	NorthWestern Energy	SD	\$ 7.00	16.7%
183	NW Natural	WA	\$ 7.00	16.7%
184	Southwestern Virginia Gas Co.	VA	\$ 7.00	16.7%
185	Superior Water, Light & Power	WI	\$ 7.00	16.7%
186	Wisconsin Public Service Corporation	WI	\$ 7.00	16.7%
187	Avista Utilities	OR	\$ 7.00	16.7%
188	Atmos Energy Corp. (MS)	MS	\$ 6.95	13.0%
189	NorthWestern Energy (Montana)	MT	\$ 6.90	12.6%
190	NSTAR Gas Company	MA	\$ 6.88	12.1%
191	Great Plains Natural Gas Co	MN	\$ 6.50	11.6%
192	Xcel Energy (Michigan)	MI	\$ 6.50	11.6%
193	Montana-Dakota Utilities Co	MT	\$ 6.35	10.7%
194	Avista Utilities	WA	\$ 6.00	10.2%
195	City of Holyoke Gas & Electric Department	MA	\$ 6.00	10.2%
196	NW Natural	OR	\$ 6.00	10.2%
197	Pike County Light & Power	PA	\$ 6.00	10.2%
198	Westfield Gas & Elec. Light Co.	MA	\$ 6.00	10.2%
199	Citizens Gas (Westfield)	IN	\$ 5.79	7.9%
200	Elkton Gas	MD	\$ 5.75	7.4%
201	Public Service Electric and Gas Company	NJ	\$ 5.46	7.0%
202	Knoxville Utilities Board	TN	\$ 5.30	6.5%
203	Interstate Power and Light	MN	\$ 5.00	6.0%
204	Southern California Gas Co.	CA	\$ 5.00	6.0%
205	Questar Gas Co	UT	\$ 5.00	5.1%
206	Southwest Gas Corporation	CA	\$ 5.00	5.1%
207	Wisconsin Public Service Corporation	MI	\$ 5.00	5.1%
208	Northern Utilities	ME	\$ 4.96	3.7%
209	Avista Utilities	ID	\$ 4.00	3.3%
210	Cascade Natural Gas (WA)	WA	\$ 4.00	3.3%
211	Intermountain Gas Co. (4)	ID	\$ 3.83	2.3%
212	Great Plains Natural Gas Co	ND	\$ 3.50	1.9%
213	Pacific Gas and Electric Company	CA	\$ 3.00	1.4%
214	Cascade Natural Gas (OR)	OR	\$ 3.00	0.9%
215	Washington Gas Light Company - Virginia	VA	\$ 3.00	0.9%
	Average Basic Charge		\$ 11.17	

- (1) Charge includes use up to 3 therms
- (2) Average of all Mid-Texas basic charges
- (3) Average of basic charges that vary based on consumption
- (4) Weighted average of summer and winter basic charges
- (5) Average of all West-Texas basic charges