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Attorneys for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	)	**CASE NO. INT-G-22-07**

DIRECT TESTIMONY OF LORI A. BLATTNER

FOR INTERMOUNTAIN GAS COMPANY

December 1, 2022

Q. Please state your name, business address, and present position with Intermountain Gas Company ("Intermountain" or "Company").

A. My name is Lori Blattner, and I am the Director of Regulatory Affairs for Intermountain Gas Company and Cascade Natural Gas Corporation ("Cascade"). My business address is 555 South Cole Road, Boise, ID 83707.

Q. Please summarize your educational and professional experience.

A. I graduated from the University of Idaho in 1993 with a Bachelor of Science degree in Agricultural Economics. I joined Intermountain in 1997 as a Regulatory Analyst and was responsible for cost of service, rate design, and weather normalizations, as well as other regulatory issues. I was promoted to Manager, Energy Efficiency and Regulatory Process in 2017. In that role, I was responsible for cost of service and weather normalization as well as launching Intermountain's Energy Efficiency program. I was promoted to Director of Regulatory Affairs for Intermountain in 2019 and to my current position in 2021. In my current role, I am responsible for all regulatory activity in Idaho, Oregon, and Washington, as well as the Energy Efficiency programs for both Intermountain and Cascade.

Q. Have you previously written or presented testimony on behalf of Intermountain before the Idaho Public Utilities Commission ("Commission")?

A. Yes, I have previously testified before this Commission in Intermountain's most recent general rate case proceeding, Case No. INT-G-16-02.

Q. What is the purpose of your testimony?

A. Intermountain's 2016 general rate case was its first since 1985. During this 30-year time span much about the Company, its distribution system, software systems, and industry

technology changed dramatically. Although many issues were fully litigated in the 2016 rate case, there were several items the Commission provided specific direction on in Order Nos. 33757 and 33879. I will provide updates on those items including the convenience and in-person pay station transaction fees, the Company's Line Extension tariff and progress related to Cost of Service. I will then discuss the collaboration between the Company and Staff on the Company's weather normalization methodology as well as the final models and resulting adjustment used in this case. In addition, I will discuss the Company's proposal to update its Non-Utility LNG Sales sharing allocations. Finally, I will outline the Company's proposed tariff changes in this case.

Convenience and In-Person Pay Station Transaction Fees

Q. What is the background on the convenience and pay station transaction fees issue?

A. In Case No. INT-G-16-02, Staff recommended that the Company remove the convenience fees it charged for payment by debit or credit card. In addition, Staff proposed that the Company remove the fee it charged customers to use the authorized pay station for cash payments. Intermountain opposed Staff's recommendation arguing that removing the convenience fee would encourage customers to switch from less expensive payment methods to those that are more expensive, increasing costs for all customers.[1]

In Order No. 33757, issued on April 28, 2017, the Commission "decline[d] to implement Staff's free payment proposal at this time. Adequate cost estimates and benefit analyses were not provided. We nevertheless encourage the Company to explore the

[1] Order No. 33757, page 38

possibility of removing these fees in the future to keep pace with what appears to be an emerging industry standard." [2]

Then on June 30, 2017, in Order No. 33805 in connection with Case No. INT-G-17-02, the Commission directed the Company to meet with Staff within 60 days of the issue date of the Order to "discuss alternatives to convenience fees". Intermountain and Staff held several discussions on convenience fees, which resulted in Case No. INT-G-18-01. In that case, the Company agreed to end the fee charged to customers for in-person pay station transactions. However, the agreement left the convenience fee in place for debit or credit card transactions. Order No. 34099 allowed the establishment of a regulatory asset to capture the costs associated with in-person pay station transactions and the recovery of those costs in the Company's PGA beginning in 2019 and until February 1, 2021, or until the Company filed a general rate case, whichever comes first. [3]

Subsequently, on December 13, 2019, the Company filed a letter in Case No. INT-G-18-01 noting that it had continued to collaborate with Staff on how to best address transaction fees. During the time that those discussions were taking place, the Commission raised concerns with the removal of convenience fees in Order No. 34405 in Suez Water Idaho Inc's Case No. SUZ-W-19-01. Based on that guidance and concerns that removing the convenience fees for debit and credit card transactions would actually encourage a shift to these more expensive forms of payment from ones that are less expensive, the Company noted that it did not plan to file "an application to request its customers bear the cost of the remaining credit/debit card transaction costs at this time."

[2] Order No. 33757 page 38-39
[3] Order No. 34099 Page 3

The Company did commit to continuing to waive the transaction fees for in-person bill payment, however.

On February 19, 2021, the Company requested the Commission extend authorization of the regulatory asset associated with in-person pay station transactions. In Order No. 35047, Case No. INT-G-21-02, the Commission authorized the Company to "continue to seek recovery of these costs in the Company's PGA." The authorization was extended from February 1, 2021 until February 1, 2023, or until the Company filed a general rate case.

Q. What is the Company's proposed treatment for the in-person payment transaction fees going forward?

A. The Company proposes that the in-person payment transaction fees be embedded in base rates going forward, and that the fees deferred from October 1, 2022 through February 1, 2023 be collected through the 2023 PGA filing as approved. The adjustment to move the in-person payment transaction fees into base rates is discussed in the testimony of Mr. Darrington.

Q. Is the Company proposing to move debit and credit card convenience fees to base rates as well?

A. No. Moving the fees for in-person transactions to base rates helps to address concerns that convenience fees unfairly impact low-income and under-banked customers. Allowing customers to pay their bills in-person without incurring additional fees also benefits all customers by encouraging timely payments and thus helping to minimize uncollectible expenses.

However, the remaining discretionary transaction fees for using credit and debit cards for bill payment represent fees for using the most expensive payment option available. There are several payment options available that do not incur additional fees for the customer or the Company, including paying online using a checking or savings account withdrawal or paying by mail. Intermountain has observed that as other utilities removed the transaction fee for credit or debit card payment options, there was a steady increase in the use of these payment options that incur a fee. This growth is driven in large part by customers that were previously using a fee-free payment option. Removing the true cost of the payment option removes the incentive for customers to choose the least-cost bill payment option. Accurate cost signals will continue to help keep Intermountain's prices lower for all customers. For this reason, Intermountain is not proposing that convenience fees for debit or credit card transactions be moved to base rates at this time.

Line Extension Tariff

Q. What work has been done to address the Commission recommendations regarding the Company's Line Extension tariff?

A. In Order No. 33757, The Commission "encourage[d] Intermountain to modify its line extension policy as soon as possible to address changes in references, rules and vested interest policy." Following receipt of the Order, Intermountain began a collaborative process with Staff to update and make more transparent its Line Extension tariff. The process began with a meeting in December 2017 to determine the scope of the update and adjustments that could be made to improve the tariff. Over the following two-year period, Intermountain and Staff engaged in a number of meetings regarding the inputs and

calculation methods for the Company's Line Extension tariff. The result was a complete replacement of the Company's General Service Provisions Section C as discussed in Order No. 34735 in Case No. INT-G-20-01. An important piece of the revised Line Extension tariff is the embedded cost methodology used to determine the Allowable Investment Factors. At the conclusion of this case the Company plans to file a compliance filing to update the embedded costs that are used to calculate the Allowable Investment Factors to reflect the costs that are approved in this case.

Cost of Service

Q. What were some of the concerns raised in the previous general rate case regarding the Company's cost of service study?

A. Order No. 33757 noted:

While we find that the Company has data that supports the known and measurable cost-of-service rate design within its large volume and transportation customers, it does not have such data for use in definitively allocating revenue requirement among the various other customer classes. As Staff stated, a load study with more class specific underlying cost information, and a more appropriate derivation of net plant-in-service would provide this data. Without full knowledge of the appropriate cost-of-service allocation, we adhere to the concept of gradualism related to cost-of-service. [4]

Q. Has Intermountain addressed the lack of a load study in the intervening years?

A. Intermountain is in the process of implementing Itron's fixed-network metering infrastructure. This system utilizes a fixed mounted data collector using two-way communication to endpoints and to the repeater to collect on-demand reads and issue

[4] Order No. 33757, Page 28

network commands. This system provides a robust collection of time-synchronized interval data. The Company had hoped to have the system installation completed by the end of 2020. However, COVID-19 and the related labor and supply chain issues have hampered installation efforts. The system is currently 60% complete with full installation estimated for the end of 2023. In April 2022, Itron placed all fixed network equipment ship dates on hold due to ongoing chip shortages and extensive overseas shutdowns. It is now expected that the equipment will begin shipping again in March 2023. As discussed further in Mr. Amen's testimony, Intermountain was able to use the daily data that is currently available to facilitate the completion of the load study options presented in this case.

Q. Has the Company addressed concerns with the derivation of net plant-in-service?

A. As demonstrated more fully in Mr. Amen's testimony and supporting exhibits, the Company is allocating both the gross plant and the associated accumulated depreciation by FERC accounts by applying appropriate allocation factors. This ensures that the resulting net plant is allocated accurately and addresses concerns raised in the previous general rate case.

Weather Normalization

Q. What is weather normalization?

A. Weather normalization adjusts test year natural gas consumption to the level that would have been consumed if the test year were a normal weather year. Temperature is the primary driver of variances in natural gas consumption. Because a portion of the Company's rates are based on consumption, variations in weather will affect the amount of revenue received by the Company. For example, a year with lower consumption due to

warmer than normal temperatures will result in lower revenues for the Company. Conversely, higher consumption due to colder than normal temperatures will result in higher revenues for the Company. Normalized natural gas consumption is used in developing the RS and GS-1 sales revenues that can be expected in a normal weather year, and upon which the revenue requirement in this case is based. Normalized natural gas usage also contributes to the development of the billing determinants used in this case.

Q. Weather normalization was an issue in the Company's last general rate case. Please outline the agreements the Company made related to weather normalization in the Settlement.

A. In the Settlement approved in Order No. 33879, the Company agreed the following terms would govern weather normalization issues in future cases:

1) Unless otherwise agreed between Staff and the Company, consumption normalization methodology will be used to adjust actual test year consumption rather than to forecast test year consumption;

2) Any adjustment to customer or consumption input data will be uniformly and consistently applied to all customer classes and all months; and

3) Interested parties will meet before the next rate case to seek consensus on weather normalization methodology.

As discussed in greater detail in the testimony that follows, the Company and Staff have engaged in a robust process over the intervening years to enact the terms of the Settlement

Q. Please outline the process employed to seek consensus on weather normalization methodology.

A. The collaborative process between the Company and Staff took place over several years. The first step was the development of and agreement on the data to be used and a process for data collection and storage. Next, agreement was reached on the weighting process for the weather data. Finally, the Company and Staff worked through the appropriate application of the weather normalization models and model development. Staff and the Company had sufficient time to work through and agree upon the process for data collection and storage, weather weighting, and the application of the models. Although both Staff and the Company invested a significant amount of time on model development, a final consensus was not reached prior to filing. As explained in more detail below, the Company has made a best effort to incorporate all of the feedback provided by Staff into the models that were ultimately used in this case. Both parties agreed that the models used were very close to what either party would have proposed and that any remaining differences can be worked out during the course of the case.

Q. Explain the underlying data as well as the data collection and storage process.

A. A new Customer Information System ("CIS") as well as the need to combine the previous residential customer classes, RS-1 and RS-2, into the single RS class approved in the case meant that the Company had an opportunity to build a process for data collection, storage and weather weighting that was transparent, robust, and nimble enough to accommodate future CIS changes and upgrades. As a result of the case, Intermountain chose to build a system based on individual premise level billing detail that includes data on all premises that received a customer charge for the month. The new system collects and stores data at

this individual premise level of detail going forward. Before the previous CIS was retired, Intermountain was also able to go back and mine the billing detail from that system to create a database of premise level billing data from 2007 to present. Because the data is stored at such a granular, premise level of detail, the new system will be able to integrate seamlessly with other CIS systems that may be implemented in the future with no issues regarding data continuity.

Q: What billing data is collected and stored?

A. Intermountain collects the following billing data for its residential and commercial customers and stores it in a table in its data warehouse:

1) Accounting Year and Month
2) Billed Therm Usage
3) Start and end date of billing range
4) Premise ID

The following information is then calculated from the data stored in the data warehouse:

1) Customer Count representing the total number of unique premises that received a bill in a given accounting month.
2) Usage Per Customer which is calculated by summing the total therm usage for a customer class in a given accounting month divided by the Customer Count in that month.
3) Rate Study Division which represents the code of the closest weather station to the billed premise, based on the premise's town code.

Q. What weather data is collected and stored?

A. The Company collects and stores daily high, low and HDD65 weather data from seven representative National Oceanic and Atmospheric Administration ("NOAA") weather sites across its service territory.

Q. What are HDD's?

A. HDD's, or heating degree days, are units used to relate a day's temperature to the energy demands of temperature sensitive load, primarily for space heating. HDD's are calculated by subtracting a day's average temperature from a reference temperature, in this case 65° Fahrenheit.

Q. What is the weather weighting process and why is it important?

A. Customers across Intermountain's service territory experience weather that can be dramatically different based on their location. It is important to match the weather customers experience with the total usage, and thus total revenues, of the Company. To enable this appropriate matching, the system uses the Rate Study Division to find the nearest weather station to the customer. The daily HDD records are then summed across the billing period. The customer billing data as well as the summed HDD for the billing period becomes one record in the weather normalization database. To calculate a Total Company HDD for each month that accurately represents the weather that contributed to the usage for the month, each customer's HDD sum for the accounting month is multiplied by 1/Customer Count for the accounting month. The results for each customer are summed to create the Total Company HDD for the accounting month. The new data collection, storage and weather weighting processes all rely on billing system data rather than adjusted data, which was an important point in the Settlement that was agreed to in the previous case.

Q. How does the Company define normal weather?

A. The Company's normal weather is based on an industry standard practice of using an average of the temperatures experienced during the most recent 30-year period. Intermountain's service territory contains regions with diverse weather patterns. To

incorporate the influences of varying temperatures on Company usage, daily weather data for the past 30 years was collected and stored as outlined above. A 30-year average of HDD's for each day of the year was calculated for each weather station.

Q. How are the weather normalization models used to adjust test year usage?

A. The weather normalization models are used to calculate an adjustment that is applied to actual usage to generate the test year volumes. The selected weather normalization model may vary, but it will always fall under the following form:

$$Consumption_t = y(W_t, C_t)$$

Where $Consumption_t$ is Usage per Customer in month *t*, *y*() is the selected predictive model, W_t is the weather input (or set of weather inputs) in month *t*, and C_t represents the set of other non-weather covariates in the predictive model.

The adjustment can be computed as follows:

$$Adjustment_t = y\big(W_{NORM,t}, C_t\big) - y(W_{ACT,t}, C_t)$$

Where $W_{NORM,t}$ is the weather that customers would experience in period *t* under normal conditions, defined as a 30-year rolling average. $W_{ACT,t}$ is the actual weather that customers experienced in period *t* of the test year. Note that since the coviariates captured in C_t are the same under normal or actual weather conditions, they will directly cancel out of the resulting adjustment. Thus, the adjustment can be simplified in terms of the difference between normal weather and actual weather as follows:

$$Adjustment_t = \beta_t \text{ x } (W_{NORM,t} - W_{ACT,t})$$

Where β_t is the coefficient within model *y*( ) estimating the usage per customer per degree day relevant to the month *t*.

Under the test year adjustment method, the total normalized consumption in each month is equal to:

$$Normalized\ Consumption = (Actual + Adjustment) \text{ x } CustomerCount$$

Where *Actual* is the observed usage per customer in the month and *CustomerCount* is the number of unique premises to have received a bill in the period.

This agreed upon method is reflected in the weather normalization adjustment shown on Exhibit No. 1.

Q. How have the forecast months in this filing been weather normalized to meet the terms of the Settlement?

A. As has been previously discussed, the test year in this case includes actual data through September 30, 2022 and forecast data for October through December 2022. In developing the RS and GS-1 usage forecast for the months of October through December, the Company was careful to employ a method that was similar to the method employed in weather normalizing the actual months. As a stand-in for the actual data that will be included in the case as it becomes available, the Company weather normalized actual usage from October through December 2021 using the monthly coefficients shown on Exhibit No. 1. The Company then calculated a normalized usage per customer from the normalized monthly usage. That normalized usage per customer was multiplied by the forecast customers for October through December 2022 to arrive at normalized usage for the forecast months of this case. As actual usage data becomes available, the Company will weather normalize the actual months as outlined on Exhibit No. 1. Because Intermountain is not using the models to create fully forecasted data for October through

December, the Company believes the proposed process ensures the Company is meeting the terms of the Settlement.

Q. What models were originally proposed as part of the collaborative process?

A. The residential model originally proposed by the Company contained monthly HDD-65 coefficients for every month except August, a summer binary term, a log price term, and an autoregressive term. The commercial model contained monthly HDD-65 coefficients for every month except July and August, a summer binary term, a log price term, and an autoregressive term. The originally proposed models are included as Exhibit No. 2.

Q. Have these models been used to calculate the weather normalization adjustment in this case?

A. No. The Company met with Staff to review the proposed models. Following that meeting the Company ran several additional variations of the models based on Staff feedback and held a follow up meeting to discuss. Staff expressed concerns with the inclusion of the autoregressive term and with leaving monthly terms out of the models. Although there was not enough time to finish discussing the models before filing this case, the Company incorporated Staff's feedback on the models and the final models proposed in this case do not include an autoregressive term and both models do include an HDD-65 term for all months. The final models are included as Exhibit No. 3. After a robust, collaborative process, the Company believes that the models used to calculate the weather normalization adjustment reflect a positive resolution of the issues that each party had with the models proposed by the other party in the previous case.

Non-Utility LNG Sales Credits

Q. Please provide a brief overview of the Company's involvement in non-utility LNG sales.

A. In 2013, Intermountain received an emergency supply request to supply liquefied natural gas ("LNG") from its Nampa LNG plant to a small LNG-based distribution utility located in southwestern Wyoming that had temporarily lost its supply of LNG. In Case No. INT-G-13-01, the Commission granted emergency authority for Intermountain to supply the needed LNG. The Company then filed Case No. INT-G-13-02 to request on-going authority to sell excess LNG from its Nampa LNG plant (as determined in its Integrated Resource Plan filed every two years) to non-utility customers. In Order No. 32793 the Commission authorized the Company to sell LNG to non-utility customers at market-based prices. Because the Nampa LNG plant and its operations and maintenance are included in base rates for the purpose of being a supply source in the event of very cold weather or extraordinary system constraints, the Commission ordered the Company to reserve $0.025 per gallon of LNG sold to cover the increased capital expenditures and another $0.025 per gallon to cover the increased O&M costs associated with the increased use of the Nampa LNG facility. Additionally, the Commission authorized the Company to share net margins from non-utility LNG sales with utility customers on a 50/50 basis. The O&M credits and margin sharing are passed back to utility customers through the Company's Purchased Gas Cost Adjustment ("PGA") filing. The amounts generated from the capital credit are used to replace existing Nampa LNG capital infrastructure due to accelerated wear and tear from producing LNG for sale.

Q. How much money related to capital and O&M credits and margin sharing has been generated since inception of the Company's involvement in non-utility LNG sales?

A. For the period 2013-2020, the Company generated over $830,000 each in capital and O&M credits and over $4.3 million in margin sharing as seen on Exhibit No. 4, Page 2, Column (j).

Q. Has the Company performed an analysis to determine the sufficiency of the capital and O&M credits?

A. Yes. The Company performed a non-utility LNG sales analysis to determine if the benefits of selling LNG to non-utility customers outweighed the costs embedded in utility customer base rates for the period 2013-2020. The Company did not include 2021 in its analysis because in February 2021 the Company discovered a leak in the outer shell of the Nampa LNG tank. To fix the leak, the Nampa LNG tank was emptied of product, warmed from cryogenic to ambient temperatures and purged. The leak was repaired in late 2021, and the Company began refilling the tank with LNG in January 2022. Sales to non-utility customers began in March 2022. The Company did not include 2021 or 2022 in its analysis because the LNG tank was out of service for repairs and maintenance for the majority of 2021, the Company did not liquefy any natural gas in 2021, and LNG sales did not resume until partway through 2022.

Q. Please explain the details of the analysis the Company performed.

A. Since the Nampa LNG facility is used for both utility and non-utility purposes, the Company developed a methodology to determine the amount of capital and O&M expenses related to non-utility LNG sales. When the Company liquefies natural gas at its Nampa LNG facility it designates a percentage of the resulting LNG for either utility or non-utility

purposes. For both the capital and O&M costs analysis, the Company used the average non-utility liquefaction percentage shown on Exhibit No. 4, Page 4, Line 5, Column (j) as the final step in the determination of costs related to non-utility LNG sales.

To determine capital costs related to non-utility LNG sales, the Company first reviewed the capital assets added to the Nampa LNG facility since 2013 when the Commission authorized the Company to sell excess LNG to non-utility customers. Exhibit No. 4, Page 5 shows the categories and amounts of Nampa LNG facility assets related to LNG truck filling from 2013-2020. On Exhibit No. 4, Page 6, the Company multiplied the identified assets on Exhibit No. 4, Page 5 by the Company's current depreciation rates authorized in Order No. 35134 (Case No. INT-G-21-01) to determine the average annual depreciation expense for Nampa LNG facility assets related to LNG truck filling. The Company then multiplied the annual depreciation expense by the non-utility LNG liquefaction percentage on Exhibit No. 4, Page 4, Line 5, Column (j) to determine the average amount of depreciation expense related to non-utility LNG sales. On Exhibit No. 4, Page 3, the Company multiplied the average depreciation expense related to non-utility LNG sales by 8 years and compared that amount to the capital credits generated from 2013-2020 and found the capital credits insufficient by approximately $96,000.

To determine O&M expenses related to non-utility LNG sales, calculated in Exhibit No. 4, Page 7, the Company averaged the specifically tracked operations expenses related to Nampa LNG facility employee time spent loading trucks for non-utility LNG sales and allocated portions of power and nitrogen costs incurred during the liquefaction process. To determine the amount of maintenance expense related to non-utility LNG sales, the Company first multiplied the 2013-2020 average maintenance expense for each Nampa

facility asset category by the respective percentage of assets related to LNG truck filling. Then the Company multiplied the result from the previous step by the non-utility liquefaction percentage from Exhibit No. 4, Page 4, Line 5, Column (j). On Exhibit No. 4, Page 3, the Company multiplied the average O&M expense related to non-utility LNG sales by 8 years and compared that amount to the O&M credits generated from 2013-2020 and found the O&M credits insufficient by approximately $500,000.

Although both the capital and O&M credits were insufficient when compared to the costs related to non-utility LNG sales, Exhibit No. 4, Page 3 shows that utility customers did experience a net benefit of approximately $3.8 million from the Company's involvement in selling LNG to non-utility customers.

Q. What does the Company propose as a result of the Company's analysis?

A. To better cover the amount of future capital and O&M costs related to non-utility LNG sales, the Company proposes to set the capital and O&M credits at $0.03 and $0.04 per gallon of LNG sold to non-utility customers, respectively. The Company determined the proposed capital and O&M credits by dividing the average depreciation and O&M expenses related to non-utility LNG sales by the 2013-2020 average amount of LNG gallons sold (see Exhibit No. 4, Page 6, Line 27 and Exhibit No.4, Page 7, Line 27). Exhibit No. 4, Page 1 shows an average increase of approximately $42,000 in the overall increased utility customer benefit based on the proposed capital and O&M credits.

Tariffs

Q. Could you briefly describe the tariff package that implements the rates proposed by Intermountain in this case?

A. Yes. Exhibit No. 5, which I am sponsoring, shows the changes to Intermountain's tariff, by striking over proposed deletions and underlining additions or amendments to the existing rate schedules. These changes conform to the testimony and exhibits of Mr. Amen. However, the Company has added an additional change to the cost of gas section of the LV-1 rate schedule to make all components of the cost of gas applicable to all LV-1 rate blocks. This change is necessary because when the Company filed its PGA it expected usage only in the first rate block, however, under the proposed rate block structure the Company expects usage in all three rate blocks. Exhibit No.6, which I am also sponsoring, shows these same rate schedules in a clean format.

Q. Does this conclude your testimony?

A. Yes.

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	CASE NO. INT-G-22-07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 1 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

Intermountain Gas Company
Weather Normalization Adjustment
For the Test Year Ending December 31, 2022

Line No.	Description	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total
1	RS													
2	HDD65:													
3	Actual Degree Days	1,118.94	1,079.74	1,046.50	605.62	514.59	274.74	55.30	0.10	7.58				4,703.10
4	Normal Degree Days	1,144.95	964.10	913.34	596.07	406.68	201.65	55.55	5.88	34.83				4,323.06
5	Difference +warmer -colder	26.007880	(115.633470)	(133.151830)	(9.545220)	(107.906480)	(73.082310)	0.245150	5.777440	27.244000	-	-	-	(380.04)
6	Model Coefficient x Difference	0.112924	0.113167	0.108848	0.099641	0.088016	0.092101	0.067579	0.088964	0.057979	0.085642	0.095893	0.108365	
7	Change in Therms/Customer	2.93691	(13.08589)	(14.49331)	(0.95110)	(9.49750)	(6.73095)	0.01657	0.51398	1.57958	-	-	-	(39.71)
8	Customers	364,502	365,320	366,388	367,064	367,726	368,281	368,434	369,020	369,524	-	-	-	3,306,259
9	HDD65 Therm Adjustment	1,070,510	(4,780,537)	(5,310,175)	(349,115)	(3,492,478)	(2,478,881)	6,105	189,669	583,693	0	0	0	(14,561,209)
10	GS-1:	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	TOTAL
11	HDD65:													
12	Actual Degree Days	1,140.65	1,111.53	1,089.45	620.31	525.41	282.88	57.12	0.14	10.01				4,837.49
13	Normal Degree Days	1,167.69	984.02	945.04	610.51	418.07	213.03	59.63	7.51	42.42				4,447.93
14	Difference +warmer -colder	27.038240	(127.510080)	(144.407230)	(9.793740)	(107.342870)	(69.849030)	2.517290	7.376320	32.405940	-	-	-	(389.57)
15	Model Coefficient x Difference	0.496787	0.495629	0.472342	0.414982	0.352877	0.366217	0.163336	0.644551	0.388738	0.393954	0.383191	0.463382	
16	Change in Therms/Customer	13.43225	(63.19769)	(68.20960)	(4.06423)	(37.87883)	(25.57990)	0.41116	4.75441	12.59742	0.00000	0.00000	0.00000	(167.74)
17	Customers (with Migration Adjustment)	34,887	34,961	35,004	34,997	35,001	34,977	34,939	34,918	34,918	-	-	-	314,602
18	HDD65 Therm Adjustment	468,611	(2,209,454)	(2,387,609)	(142,236)	(1,325,797)	(894,708)	14,366	166,014	439,877	-	-	-	(5,870,936)
19	Total Therm Adjustment	**1,539,121**	**(6,989,991)**	**(7,697,784)**	**(491,351)**	**(4,818,275)**	**(3,373,589)**	**20,471**	**355,683**	**1,023,570**	**-**	**-**	**-**	**(20,432,145)**

Case No. INT-G-22-07
L. Blattner, IGC
Exhibit No. 1
Page 1 of 1

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	CASE NO. INT-G-22-07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 2 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

INTERMOUNTAIN GAS COMPANY

ORIGINAL PROPOSAL

WEATHER NORMALIZATION MODELS

2022

RS Proposed Model
RS_2022_LOGP
PRICE - NATURAL LOG

Dependent Variable: THERMS
Method: ARMA Conditional Least Squares (Marquardt - EViews legacy)
Sample (adjusted): 2007M02 2021M12
Included observations: 179 after adjustments
Convergence achieved after 8 iterations

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	23.7842	4.425726	5.374079	0.0000
Jan-65	0.111925	0.000851	131.4648	0.0000
Feb-65	0.112139	0.001015	110.4672	0.0000
Mar-65	0.107627	0.001219	88.26378	0.0000
Apr-65	0.098156	0.00168	58.44148	0.0000
May-65	0.085367	0.002552	33.44829	0.0000
Jun-65	0.086597	0.005315	16.29356	0.0000
Jul-65	0.061805	0.012225	5.055451	0.0000
Sep-65	0.048305	0.012168	3.969845	0.0001
Oct-65	0.081008	0.00412	19.66062	0.0000
Nov-65	0.093984	0.001771	53.06761	0.0000
Dec-65	0.107366	0.001061	101.1639	0.0000
SUMMER	4.265111	0.970514	4.394691	0.0000
LOG_PRICE	-3.322272	1.022986	-3.247621	0.0014
AR(1)	0.407175	0.069906	5.824567	0.0000

R-squared	0.998465	Mean dependent var	60.93912
Adjusted R-squared	0.998334	S.D. dependent var	44.11888
S.E. of regression	1.800903	Akaike info criterion	4.094532
Sum squared resid	531.8935	Schwarz criterion	4.361632
Log likelihood	-351.4606	Hannan-Quinn criter.	4.202839
F-statistic	7618.912	Durbin-Watson stat	1.996883
Prob(F-statistic)	0		

Inverted AR Roots	0.41

GS Proposed Model
GS_2022_LOGP
PRICE - NATURAL LOG

Dependent Variable: THERMS
Method: ARMA Conditional Least Squares (Marquardt - EViews legacy)
Sample (adjusted): 2007M02
2021M12
Included observations: 179 after adjustments
Convergence achieved after 8 iterations

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	277.9109	38.28175	7.259618	0.0000
Jan-65	0.493109	0.007093	69.51915	0.0000
Feb-65	0.492354	0.008443	58.31681	0.0000
Mar-65	0.468113	0.010078	46.4487	0.0000
Apr-65	0.409411	0.013856	29.5476	0.0000
May-65	0.341071	0.020938	16.28977	0.0000
Jun-65	0.339675	0.041967	8.093841	0.0000
Sep-65	0.278494	0.082647	3.369671	0.0009
Oct-65	0.371672	0.031901	11.65069	0.0000
Nov-65	0.37483	0.014329	26.15828	0.0000
Dec-65	0.459833	0.008787	52.33209	0.0000
SUMMER	29.34844	8.078959	3.632701	0.0004
LOG_PRICE	-49.48294	8.814089	-5.614074	0.0000
AR(1)	0.448652	0.069257	6.478105	0.0000

R-squared	0.994652	Mean dependent var	295.2166
Adjusted R-squared	0.994231	S.D. dependent var	195.9836
S.E. of regression	14.8858	Akaike info criterion	8.313676
Sum squared resid	36561.84	Schwarz criterion	8.562969
Log likelihood	-730.074	Hannan-Quinn criter.	8.414763
F-statistic	2360.714	Durbin-Watson stat	2.020702
Prob(F-statistic)	0		

Inverted AR Roots	0.45

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	CASE NO. INT-G-22-07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 3 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

INTERMOUNTAIN GAS COMPANY

FINAL

WEATHER NORMALIZATION MODELS

2022

RS_2021_LOGP_AUG_WITHOUT_AR

***FINAL* MODEL, AR REMOVED, AUG HDD**

Dependent Variable: THERMS
Method: Least Squares
Sample: 2007M01 2021M12
Included observations: 180

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	22.37114	2.9986	7.460427	0.0000
JAN65	0.112924	0.0009	123.9591	0.0000
FEB65	0.113167	0.0011	104.1043	0.0000
MAR65	0.108848	0.0013	83.14054	0.0000
APR65	0.099641	0.0018	55.13101	0.0000
MAY65	0.088016	0.0028	31.84906	0.0000
JUN65	0.092101	0.0057	16.16188	0.0000
JUL65	0.067579	0.0164	4.110612	0.0001
AUG65	0.088964	0.090551	0.982472	0.3273
SEP65	0.057979	0.0165	3.506495	0.0006
OCT65	0.085642	0.0045	19.07673	0.0000
NOV65	0.095893	0.0019	49.3445	0.0000
DEC65	0.108365	0.0012	94.2648	0.0000
SUMMER	5.085433	1.0797	4.709999	0.0000
LOG_PRICE	-3.223074	0.6813	-4.730609	0.0000

R-squared	0.998119	Mean dependent var	61.38122
Adjusted R-squared	0.99796	S.D. dependent var	44.39351
S.E. of regression	2.005329	Akaike info criterion	4.309149
Sum squared resid	663.522	Schwarz criterion	4.575229
Log likelihood	-372.8234	Hannan-Quinn criter.	4.417033
F-statistic	6254.245	Durbin-Watson stat	1.180947
Prob(F-statistic)	0		

GS_2021_LOGP_AUG_WITHOUT_AR

***FINAL* MODEL, AR REMOVED, AUG HDD**

Dependent Variable: THERMS
Method: Least Squares
Sample: 2007M01 2021M12
Included observations: 180

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	277.7842	24.5580	11.31134	0.0000
JAN65	0.496787	0.0077	64.78261	0.0000
FEB65	0.495629	0.0091	54.1862	0.0000
MAR65	0.472342	0.0109	43.18784	0.0000
APR65	0.414982	0.0151	27.51877	0.0000
MAY65	0.352877	0.0230	15.35907	0.0000
JUN65	0.366217	0.0461	7.951086	0.0000
JUL65	0.163336	0.1302	1.254688	0.2114
AUG65	0.644551	0.633342	1.017698	0.3103
SEP65	0.388738	0.1190	3.26786	0.0013
OCT65	0.393954	0.0354	11.12132	0.0000
NOV65	0.383191	0.0160	23.94772	0.0000
DEC65	0.463382	0.0096	48.0312	0.0000
SUMMER	29.99006	9.3265	3.21557	0.0016
LOG_PRICE	-50.45898	5.5307	-9.123488	0.0000

R-squared	0.993351	Mean dependent var	297.2173
Adjusted R-squared	0.992787	S.D. dependent var	197.2702
S.E. of regression	16.75455	Akaike info criterion	8.554873
Sum squared resid	46317.99	Schwarz criterion	8.820952
Log likelihood	-754.9385	Hannan-Quinn criter.	8.662757
F-statistic	1760.698	Durbin-Watson stat	1.075405
Prob(F-statistic)	0		

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 4 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

Intermountain Gas Company
Non-Utility LNG Sales Analysis
Current vs. Proposed

Line No.	Description	Current	Proposed	Difference
	(a)	(b)	(c)	(d)
1	Capital Credit per gallon	$ 0.025	$ 0.030	$ 0.005
2	O&M Credit per gallon	0.025	0.040	0.015
3	Average Gallons Sold	4,157,491	4,157,491	
4	Average Capital Credit	$ 103,937.28	$ 124,724.73	$ 20,787.46
5	Average O&M Credit	103,937.28	166,299.64	62,362.37
6	Average LNG Margin Sharing	547,793.60	506,218.69	(41,574.91)
7	Average Benefits to Customers	$ 755,668.15	$ 797,243.06	$ 41,574.91
8	Average Costs to Utility Customers	$ 282,003.90	$ 282,003.90	$ -
9	Average Net Cost/(Benefit) to Utility Customers	$ (473,664.25)	$ (515,239.16)	$ (41,574.91)

Intermountain Gas Company
Non-Utility LNG Sales Analysis
2013-2020 Non-Utility LNG Sales Credits and Margin Sharing

Line No.	Description	2013	2014	2015	2016	2017	2018	2019	2020	Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	Capital Credits Generated	$ 23,001.54	$ 89,714.18	$ 88,254.23	$ 80,605.02	$ 82,847.39	$ 131,977.01	$ 181,224.04	$ 153,874.75	$ 831,498.16
2	O&M Credits Generated	23,001.82	89,714.24	88,254.26	80,605.02	82,847.39	131,977.01	181,224.03	153,874.75	831,498.52
3	Margin Sharing	131,870.93	550,345.61	409,313.43	375,871.92	386,806.55	706,468.17	1,114,905.92	706,766.28	4,382,348.81
4	Total Credits and Margin Sharing	$ 177,874.29	$ 729,774.03	$ 585,821.92	$ 537,081.96	$ 552,501.33	$ 970,422.19	$ 1,477,353.99	$ 1,014,515.78	$ 6,045,345.49

Intermountain Gas Company
Non-Utility LNG Sales Analysis
2013-2020 Net Cost/(Benefit) of Non-Utility LNG Sales to Utility Customers

Line No.	Description	Amount
	(a)	(b)
1	*Capital Credit Analysis*	
2	Depreciation Expense Related to Non-Utility Sales (2013-2020)	$ 927,222.98
3	Capital Credits (2013-2020)	(831,498.16)
4	Net Cost/(Benefit) to Customers	$ 95,724.82
5	*O&M Credit Analysis*	
6	O&M Expense Related to Non-Utility Sales (2013-2020)	$ 1,328,808.25
7	O&M Credits (2013-2020)	(831,498.52)
8	Net Cost/(Benefit) to Customers	$ 497,309.73
9	LNG Margin Sharing (2013-2020)	(4,382,348.81)
10	Total Net Cost/(Benefit) to Customers (2013-2020)	$ (3,789,314.26)

Intermountain Gas Company
Non-Utility LNG Sales Analysis
Non-Utility LNG Liquefaction Percentage

Line No.	Description	2013	2014	2015	2016 [1]	2017	2018	2019	2020	Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	Utility Liquefaction (therms)	400,000	1,012,776	1,598,255	1,584,124	2,005,895	396,233	1,643,701	1,132,209	9,773,193
2	Non-Utility Liquefaction (therms)	1,523,431	2,830,826	4,109,793	737,464	4,257,148	3,566,100	7,187,992	4,529,223	28,741,977
3	Total	1,923,431	3,843,602	5,708,048	2,321,588	6,263,043	3,962,333	8,831,693	5,661,432	38,515,170
4	Utility Liquefaction %	21%	26%	28%	68%	32%	10%	19%	20%	25%
5	Non-Utility Liquefaction %	79%	74%	72%	32%	68%	90%	81%	80%	75%
6	Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

[1] Liquefaction in April and May of 2016 was entirely reserved for utility purposes to help build a sufficient balance to serve utility customers as determined in the Company's Integrated Resource Plan. This caused the utility/non-utility liquefaction percentages to increase/decrease when compared to years before and after.

Intermountain Gas Company
Non-Utility LNG Sales Analysis
Nampa LNG Facility Assets Related to LNG Truck Filling

Line No.	Description	2013	2014	2015	2016	2017	2018	2019	2020	Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1	361 - Structures & Improvements	$ 27,993.19	$ 127,512.87	$ 27,223.66	$ 199,366.00	$ 22,064.34	$ 371,622.17	$ 413,479.91	$ 38,544.61	$ 1,227,806.75
2	363 - Measure & Reg Equip.	18,246.80	-	-	-	-	-	-	-	18,246.80
3	363 - Liquefaction	73,037.36	92,546.59	603,713.98	161,790.08	67,025.39	41,364.38	38,614.83	754,204.11	1,832,296.72
4	363 - Vaporization	8,165.71	-	-	-	-	-	-	-	8,165.71
5	363 - Compressor Eq.	-	3,615,285.56	8,475.11	-	-	-	-	-	3,623,760.67
6	363 - Purification Eq.	-	58,197.07	243,406.16	36,741.47	24,754.64	298,234.89	30,735.65	-	692,069.88
7	Total	$ 127,443.06	$ 3,893,542.09	$ 882,818.91	$ 397,897.55	$ 113,844.37	$ 711,221.44	$ 482,830.39	$ 792,748.72	$ 7,402,346.53

Intermountain Gas Company
Non-Utility LNG Sales Analysis
Average Depreciation Expense Related to Non-Utility LNG Sales

Line No.	Description	Amount
	(a)	(b)
1	*2013-2020 Nampa LNG Plant Assets Related to LNG Truck Filling*	
2	361 - Structures & Improvements	$ 1,227,806.75
3	363 - Measure & Reg Equip.	18,246.80
4	363 - Liquefaction	1,832,296.72
5	363 - Vaporization	8,165.71
6	363 - Compressor Eq.	3,623,760.67
7	363 - Purification Eq.	692,069.88
8	Total	$ 7,402,346.53
9	*Case No. INT-G-21-01 Depreciation Rates*	
10	361 - Structures & Improvements	4.06%
11	363 - Measure & Reg Equip.	1.05%
12	363 - Liquefaction	1.28%
13	363 - Vaporization	1.76%
14	363 - Compressor Eq.	2.04%
15	363 - Purification Eq.	1.12%
16	*Average Depreciation Expense Related to LNG Truck Filling*	
17	361 - Structures & Improvements	$ 49,848.95
18	363 - Measure & Reg Equip.	191.59
19	363 - Liquefaction	23,453.40
20	363 - Vaporization	143.72
21	363 - Compressor Eq.	73,924.72
22	363 - Purification Eq.	7,751.18
23	Subtotal	$ 155,313.56
24	Non-Utility Liquefaction %	75%
25	Average Depreciation Expense Related to Non-Utility LNG Sales	$ 115,902.87
26	Average Gallons Sold Annually	4,157,491
27	Proposed Credit (Rounded)	$ 0.03

Intermountain Gas Company
Non-Utility LNG Sales Analysis
Average O&M Related to Non-Utility LNG Sales

Line No.	Description		Amount
	(a)		(b)
1	Average Operations Expense (Workorder 206356)	$	97,211.35
2	*Average % Plant Related to LNG Truck Filling to Total Plant*		
3	361 - Structures & Improvements		12.85%
4	363 - Measure & Reg Equip.		9.20%
5	363 - Liquefaction		42.30%
6	363 - Vaporization		0.27%
7	363 - Compressor Eq.		42.96%
8	363 - Purification Eq.		35.59%
9	*Average Maintenance Expense (from FERC Form 2)*		
10	843.2 Maintenance of Structures	$	32,460.13
11	843.8 Maintenance of Measuring and Regulating Equipment		-
12	843.5 Maintenance of Liquefaction Equipment		93,237.88
13	843.6 Maintenance of Vaporizing Equipment		88,400.38
14	843.7 Maintenance of Compressor Equipment		80,225.00
15	843.4 Maintenance of Purification Equipment		39,328.13
16	Non-Utility Liquefaction %		75%
17	*Average Maintenance Expense Related to Non-Utility LNG Sales*		
18	843.2 Maintenance of Structures	$	3,112.44
19	843.8 Maintenance of Measuring and Regulating Equipment		-
20	843.5 Maintenance of Liquefaction Equipment		29,431.83
21	843.6 Maintenance of Vaporizing Equipment		180.18
22	843.7 Maintenance of Compressor Equipment		25,720.52
23	843.4 Maintenance of Purification Equipment		10,444.71
24	Average Maintenance Expense Related to Non-Utility LNG Sales	$	68,889.68
25	Average O&M Expense Related to Non-Utility LNG Sales	$	166,101.03
26	Average Gallons Sold Annually		4,157,491
27	Proposed Credit (Rounded)	$	0.04

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	CASE NO. INT-G-22-07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 5 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538 & 35539~~
Jan Noriyuki Secretary

Rate Schedule RS
RESIDENTIAL SERVICE

APPLICABILITY:

Applicable to any customer using natural gas for residential purposes.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	~~$5.50~~ per bill $9.00		
Per Therm Charge:	~~$0.73392~~* $0.71203		
*Includes the following:			
Cost of Gas:	1) Temporary purchased gas cost adjustment	($0.00057)	
	2) Weighted average cost of gas	$0.39216	
	3) Gas transportation cost	$0.16364	
Distribution Cost:		~~$0.16305~~	$0.14116
EE Charge:		$0.01564	

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

ENERGY EFFICIENCY CHARGE ADJUSTMENT:

This tariff is subject to an adjustment for costs related to the Company's Energy Efficiency program as provided for in Rate Schedule EEC-RS. The Energy Efficiency Charge is separately stated on customer bills.

SERVICE CONDITIONS:

All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this rate schedule is a part.

Case No. INT-G-22-07
L. Blattner, IGC
Exhibit No. 5
Page 1 of 8

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule GS-1
GENERAL SERVICE

APPLICABILITY:

Applicable to customers whose requirements for natural gas do not exceed 2,000 therms per day, at any point on the Company's distribution system. Requirements in excess of 2,000 therms per day may be allowed at the Company's discretion.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	~~$9.50~~ per bill				$15.00
Per Therm Charge:	Block One:	First	200 therms per bill @	~~$0.75436~~*	$0.74716
	Block Two:	Next	1,800 therms per bill @	~~$0.73088~~*	$0.72460
	Block Three:	Next	8,000 therms per bill @	~~$0.70821~~*	$0.70281
	Block Four:	Over	10,000 therms per bill @	~~$0.63965~~*	$0.63692

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990

Distribution Cost:	Block One:	First	200 therms per bill @	~~$0.18465~~	$0.17745
	Block Two:	Next	1,800 therms per bill @	~~$0.16117~~	$0.15489
	Block Three:	Next	8,000 therms per bill @	~~$0.13850~~	$0.13310
	Block Four:	Over	10,000 therms per bill @	~~$0.06994~~	$0.06721

EE Charge: $0.00320

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule GS-1
GENERAL SERVICE
(Continued)

For separately metered deliveries of gas utilized solely as Compressed Natural Gas Fuel in vehicular internal combustion engines.

Customer Charge:	~~$9.50~~ per bill	Sixty Fifth	$15.00
Per Therm Charge:	Block One: First 10,000 therms per bill @	~~$0.70501~~*	$0.69961
	Block Two: Over 10,000 therms per bill @	~~$0.63645~~*	$0.63372

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990
Distribution Cost:	Block One: First 10,000 therms per bill @	~~$0.13850~~ $0.13310
	Block Two: Over 10,000 therms per bill @	~~$0.06994~~ $0.06721

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

ENERGY EFFICIENCY CHARGE ADJUSTMENT:

This tariff is subject to an adjustment for costs related to the Company's Energy Efficiency program as provided for in Rate Schedule EEC-GS. The Energy Efficiency Charge is not applicable to gas utilized solely as Compressed Natural Gas Fuel in vehicular internal combustion engines. The Energy Efficiency Charge is separately stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this rate schedule is a part.

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule IS-R
RESIDENTIAL INTERRUPTIBLE SNOWMELT SERVICE

APPLICABILITY:

Applicable to any residential customer otherwise eligible to receive service under Rate Schedule RS who has added natural gas snowmelt equipment after 6/1/2010. The intended use of the snowmelt equipment is to melt snow and/or ice on sidewalks, driveways or any other similar appurtenances. Any and all such applications meeting the above criteria will be subject to service under Rate Schedule IS-R and will be separately and individually metered. All service hereunder is interruptible at the sole discretion of the Company.

FACILITY REIMBURSEMENT CHARGE:

All new interruptible Snowmelt service customers are required to pay for the cost of the Snowmelt meter set and other related facility and equipment costs, prior to the installation of the meter set. Any request to alter the physical location of the meter set and related facilities from Company's initial design may be granted provided, however, the Company can reasonably accommodate said relocation and Customer agrees to pay all related costs.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	~~$5.50~~ per bill	$8.00
Per Therm Charge:	$~~0.73618~~*	$0.71429

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01733
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.16364
Distribution Cost:		~~$0.16305~~ $0.14116

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule IS-C
SMALL COMMERICAL INTERRUPTIBLE SNOWMELT SERVICE

APPLICABILITY:

Applicable to any customer otherwise eligible to receive gas service under Rate Schedule GS-1 who has added natural gas snowmelt equipment after 6/1/2010. The intended use of the snowmelt equipment is to melt snow and/or ice on sidewalks, driveways or any other similar appurtenances. Any and all such applications meeting the above criteria will be subject to service under Rate Schedule IS-C and will be separately and individually metered. All service hereunder is interruptible at the sole discretion of the Company.

FACILITY REIMBURSEMENT CHARGE:

All new interruptible Snowmelt service customers are required to pay for the cost of the Snowmelt meter set and other related facility and equipment costs, prior to the installation of the meter set. Any request to alter the physical location of the meter set and related facilities from Company's initial design may be granted provided, however, the Company can reasonably accommodate said relocation and Customer agrees to pay all related costs.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	~~$9.50~~ per bill			$12.50
Per Therm Charge:	Block One:	First	200 therms per bill @	~~$0.75116~~* $0.74396
	Block Two:	Next	1,800 therms per bill @	~~$0.72768~~* $0.72140
	Block Three:	Next	8,000 therms per bill @	~~$0.70501~~* $0.69961
	Block Four:	Over	10,000 therms per bill @	~~$0.63645~~* $0.63372

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990

Distribution Charge:	Block One:	First	200 therms per bill @	~~$0.18465~~ $0.17745
	Block Two:	Next	1,800 therms per bill @	~~$0.16117~~ $0.15489
	Block Three:	Next	8,000 therms per bill @	~~$0.13850~~ $0.13310
	Block Four:	Over	10,000 therms per bill @	~~$0.06994~~ $0.06721

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IDAHO PUBLIC UTILITIES COMMISSION
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~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule LV-1
LARGE VOLUME FIRM SALES SERVICE

AVAILABILITY:

Available at any mutually agreeable delivery point on the Company's distribution system to any existing customer receiving service under the Company's rate schedule LV-1 or any customer not previously served under this schedule whose usage does not exceed 500,000 therms annually, upon execution of a one-year minimum written service contract for firm sales service in excess of 200,000 therms per year.

MONTHLY RATE:

Customer Charge: $150.00 per bill

Demand Charge: ~~$0.30000~~ per MDFQ therm $0.32000

Per Therm Charge:	Block One:	First	35,000 ~~250,000~~	therms per bill @	$0.54173*
	Block Two:	Next	35,000 ~~500,000~~	therms per bill @	~~$0.52384*~~ $0.53081
	Block Three:	Over	70,000 ~~750,000~~	therms per bill @	~~$0.44733*~~ $0.52773

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	
	~~Block One and Two~~	$0.03247
	~~Block Three~~	~~$0.05210~~
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost ~~(Block One and Two only)~~	$0.08710

Distribution Cost:	Block One:	First	35,000 ~~250,000~~	therms per bill @	$0.03000
	Block Two:	Next	35,000 ~~500,000~~	therms per bill @	~~$0.01211~~ $0.01908
	Block Three:	Over	70,000 ~~750,000~~	therms per bill @	~~$0.00307~~ $0.01600

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. The customer shall negotiate with the Company, a mutually agreeable Maximum Daily Firm Quantity (MDFQ), which will be stated in and in effect throughout the term of the service contract.

3. The monthly Demand Charge will be equal to the MDFQ times the Demand Charge rate. Demand Charge relief will be afforded to those LV-1 customers when circumstances impacted by force majeure events prevent the Company from delivering natural gas to the customer's meter.

IDAHO PUBLIC UTILITIES COMMISSION
Approved ~~Sept. 27, 2022~~ Effective ~~Oct. 1, 2022~~
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule T-3
INTERRUPTIBLE DISTRIBUTION TRANSPORTATION SERVICE

AVAILABILITY:

Available at any point on the Company's distribution system to any customer upon execution of a one year minimum written service contract.

MONTHLY RATE:

Customer Charge:	$300.00 per bill			
Per Therm Charge:	Block One:	First	100,000 therms transported @ ~~$0.03771~~*	$0.03692
	Block Two:	Next	50,000 therms transported @ ~~$0.01487~~*	$0.01455
	Block Three:	Over	150,000 therms transported @ ~~$0.00496~~*	$0.00484

*Includes temporary purchased gas cost adjustment of ($0.00082)

ANNUAL MINIMUM BILL:

The customer shall be subject to the payment of an annual minimum bill based on annual usage of 200,000 therms. The deficit usage below 200,000 therms shall be billed at the T-3 Block 1 rate.

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. This service does not include the cost of the customer's gas supply or the interstate pipeline capacity. The customer is responsible for procuring its own supply of natural gas and transportation to Intermountain's distribution system under this Rate Schedule.

3. The customer understands and agrees that the Company is not responsible to deliver gas supplies to the customer which have not been nominated, scheduled, and delivered by the interstate pipeline to the designated city gate.

4. The Company, in its sole discretion, shall determine whether or not it has adequate capacity to accommodate transportation of the customer's gas supply on the Company's distribution system.

5. If requested by the Company, the customer expressly agrees to immediately curtail or interrupt its operations during periods of capacity constraints on the Company's distribution system.

IDAHO PUBLIC UTILITIES COMMISSION
Approved **Effective**
~~Sept. 27, 2022~~ **~~Oct. 1, 2022~~**
~~Per ON 35538~~
Jan Noriyuki Secretary

Rate Schedule T-4
FIRM DISTRIBUTION ONLY TRANSPORTATION SERVICE

AVAILABILITY:

Available at any mutually agreeable delivery point on the Company's distribution system to any customer upon execution of a one year minimum written service contract for firm distribution transportation service in excess of 200,000 therms per year**.**

MONTHLY RATE:

Customer Charge:	$150.00 per bill		
Demand Charge:	~~$0.28032~~ per MDFQ therm* $0.30032		
Per Therm Charge:	Block One:	First	250,000 therms transported @ ~~$0.02395~~ $0.02393
	Block Two:	Next	500,000 therms transported @ ~~$0.00847~~ $0.00846
	Block Three:	Over	750,000 therms transported @ $0.00260

*Includes temporary purchased gas cost adjustment of ($0.01968)

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA**.** This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. This service does not include the cost of the customer's gas supply of the interstate pipeline capacity. The customer is responsible for procuring its own supply of natural gas and transportation to Intermountain's distribution system under this Rate Schedule.

3. The customer understands and agrees that the Company is not responsible to deliver gas supplies to the customer which have not been nominated, scheduled, and delivered by the interstate pipeline to the designated city gate.

4. The customer shall negotiate with the Company, a mutually agreeable Maximum Daily Firm Quantity (MDFQ), which will be stated in and in effect throughout the term of the service contract.

5. The monthly Demand Charge will be equal to the MDFQ times the Demand Charge rate. Demand Charge relief will be afforded to those T-4 customers when circumstances impacted by force majeure events prevent the Company from delivering natural gas to the customer's meter.

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Attorneys for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR NATURAL GAS SERVICE IN THE STATE OF IDAHO	CASE NO. INT-G-22-07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXHIBIT 6 TO ACCOMPANY THE

DIRECT TESTIMONY OF LORI A. BLATTNER

Rate Schedule RS
RESIDENTIAL SERVICE

APPLICABILITY:

Applicable to any customer using natural gas for residential purposes.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	$9.00 per bill	
Per Therm Charge:	$0.71203*	
*Includes the following:		
Cost of Gas:	1) Temporary purchased gas cost adjustment	($0.00057)
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.16364
Distribution Cost:		$0.14116
EE Charge:		$0.01564

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

ENERGY EFFICIENCY CHARGE ADJUSTMENT:

This tariff is subject to an adjustment for costs related to the Company's Energy Efficiency program as provided for in Rate Schedule EEC-RS. The Energy Efficiency Charge is separately stated on customer bills.

SERVICE CONDITIONS:

All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this rate schedule is a part.

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Rate Schedule GS-1
GENERAL SERVICE

APPLICABILITY:

Applicable to customers whose requirements for natural gas do not exceed 2,000 therms per day, at any point on the Company's distribution system. Requirements in excess of 2,000 therms per day may be allowed at the Company's discretion.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	$15.00 per bill			
Per Therm Charge:	Block One:	First	200 therms per bill @	$0.74716*
	Block Two:	Next	1,800 therms per bill @	$0.72460*
	Block Three:	Next	8,000 therms per bill @	$0.70281*
	Block Four:	Over	10,000 therms per bill @	$0.63692*

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990

Distribution Cost:	Block One:	First	200 therms per bill @	$0.17745
	Block Two:	Next	1,800 therms per bill @	$0.15489
	Block Three:	Next	8,000 therms per bill @	$0.13310
	Block Four:	Over	10,000 therms per bill @	$0.06721

EE Charge: $0.00320

Rate Schedule GS-1
GENERAL SERVICE
(Continued)

For separately metered deliveries of gas utilized solely as Compressed Natural Gas Fuel in vehicular internal combustion engines.

Customer Charge:	$15.00 per bill		
Per Therm Charge:	Block One:	First 10,000 therms per bill @	$0.69961*
	Block Two:	Over 10,000 therms per bill @	$0.63372*

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990

Distribution Cost:	Block One:	First 10,000 therms per bill @	$0.13310
	Block Two:	Over 10,000 therms per bill @	$0.06721

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

ENERGY EFFICIENCY CHARGE ADJUSTMENT:

This tariff is subject to an adjustment for costs related to the Company's Energy Efficiency program as provided for in Rate Schedule EEC-GS. The Energy Efficiency Charge is not applicable to gas utilized solely as Compressed Natural Gas Fuel in vehicular internal combustion engines. The Energy Efficiency Charge is separately stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this rate schedule is a part.

Rate Schedule IS-R
RESIDENTIAL INTERRUPTIBLE SNOWMELT SERVICE

APPLICABILITY:

Applicable to any residential customer otherwise eligible to receive service under Rate Schedule RS who has added natural gas snowmelt equipment after 6/1/2010. The intended use of the snowmelt equipment is to melt snow and/or ice on sidewalks, driveways or any other similar appurtenances. Any and all such applications meeting the above criteria will be subject to service under Rate Schedule IS-R and will be separately and individually metered. All service hereunder is interruptible at the sole discretion of the Company.

FACILITY REIMBURSEMENT CHARGE:

All new interruptible Snowmelt service customers are required to pay for the cost of the Snowmelt meter set and other related facility and equipment costs, prior to the installation of the meter set. Any request to alter the physical location of the meter set and related facilities from Company's initial design may be granted provided, however, the Company can reasonably accommodate said relocation and Customer agrees to pay all related costs.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	$8.00 per bill	
Per Therm Charge:	$0.71429*	
*Includes the following:		
Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01733
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.16364
Distribution Cost:		$0.14116

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

Rate Schedule IS-C
SMALL COMMERICAL INTERRUPTIBLE SNOWMELT SERVICE

APPLICABILITY:

Applicable to any customer otherwise eligible to receive gas service under Rate Schedule GS-1 who has added natural gas snowmelt equipment after 6/1/2010. The intended use of the snowmelt equipment is to melt snow and/or ice on sidewalks, driveways or any other similar appurtenances. Any and all such applications meeting the above criteria will be subject to service under Rate Schedule IS-C and will be separately and individually metered. All service hereunder is interruptible at the sole discretion of the Company**.**

FACILITY REIMBURSEMENT CHARGE:

All new interruptible Snowmelt service customers are required to pay for the cost of the Snowmelt meter set and other related facility and equipment costs, prior to the installation of the meter set. Any request to alter the physical location of the meter set and related facilities from Company's initial design may be granted provided, however, the Company can reasonably accommodate said relocation and Customer agrees to pay all related costs.

RATE:

Monthly minimum charge is the Customer Charge.

Customer Charge:	$12.50 per bill			
Per Therm Charge:	Block One:	First	200 therms per bill @	$0.74396*
	Block Two:	Next	1,800 therms per bill @	$0.72140*
	Block Three:	Next	8,000 therms per bill @	$0.69961*
	Block Four:	Over	10,000 therms per bill @	$0.63372*

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.01445
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.15990

Distribution Charge:	Block One:	First	200 therms per bill @	$0.17745
	Block Two:	Next	1,800 therms per bill @	$0.15489
	Block Three:	Next	8,000 therms per bill @	$0.13310
	Block Four:	Over	10,000 therms per bill @	$0.06721

Rate Schedule LV-1
LARGE VOLUME FIRM SALES SERVICE

AVAILABILITY:

Available at any mutually agreeable delivery point on the Company's distribution system to any existing customer receiving service under the Company's rate schedule LV-1 or any customer not previously served under this schedule whose usage does not exceed 500,000 therms annually, upon execution of a one-year minimum written service contract for firm sales service in excess of 200,000 therms per year.

MONTHLY RATE:

Customer Charge:	$150.00 per bill			
Demand Charge:	$0.32000 per MDFQ therm			
Per Therm Charge:	Block One:	First	35,000 therms per bill @	$0.54173*
	Block Two:	Next	35,000 therms per bill @	$0.53081*
	Block Three:	Over	70,000 therms per bill @	$0.52773*

*Includes the following:

Cost of Gas:	1) Temporary purchased gas cost adjustment	$0.03247
	2) Weighted average cost of gas	$0.39216
	3) Gas transportation cost	$0.08710

Distribution Cost:	Block One:	First	35,000 therms per bill @	$0.03000
	Block Two:	Next	35,000 therms per bill @	$0.01908
	Block Three:	Over	70,000 therms per bill @	$0.01600

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. The customer shall negotiate with the Company, a mutually agreeable Maximum Daily Firm Quantity (MDFQ), which will be stated in and in effect throughout the term of the service contract.

3. The monthly Demand Charge will be equal to the MDFQ times the Demand Charge rate. Demand Charge relief will be afforded to those LV-1 customers when circumstances impacted by force majeure events prevent the Company from delivering natural gas to the customer's meter.

Rate Schedule T-3
INTERRUPTIBLE DISTRIBUTION TRANSPORTATION SERVICE

AVAILABILITY:

Available at any point on the Company's distribution system to any customer upon execution of a one year minimum written service contract.

MONTHLY RATE:

Customer Charge:	$300.00 per bill		
Per Therm Charge:	Block One:	First	100,000 therms transported @ $0.03692*
	Block Two:	Next	50,000 therms transported @ $0.01455*
	Block Three:	Over	150,000 therms transported @ $0.00484*

*Includes temporary purchased gas cost adjustment of ($0.00082)

ANNUAL MINIMUM BILL:

The customer shall be subject to the payment of an annual minimum bill based on annual usage of 200,000 therms. The deficit usage below 200,000 therms shall be billed at the T-3 Block 1 rate.

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA. This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. This service does not include the cost of the customer's gas supply or the interstate pipeline capacity. The customer is responsible for procuring its own supply of natural gas and transportation to Intermountain's distribution system under this Rate Schedule.

3. The customer understands and agrees that the Company is not responsible to deliver gas supplies to the customer which have not been nominated, scheduled, and delivered by the interstate pipeline to the designated city gate.

4. The Company, in its sole discretion, shall determine whether or not it has adequate capacity to accommodate transportation of the customer's gas supply on the Company's distribution system.

5. If requested by the Company, the customer expressly agrees to immediately curtail or interrupt its operations during periods of capacity constraints on the Company’s distribution system.

Rate Schedule T-4
FIRM DISTRIBUTION ONLY TRANSPORTATION SERVICE

AVAILABILITY:

Available at any mutually agreeable delivery point on the Company's distribution system to any customer upon execution of a one year minimum written service contract for firm distribution transportation service in excess of 200,000 therms per year**.**

MONTHLY RATE:

Customer Charge:	$150.00 per bill		
Demand Charge:	$0.30032 per MDFQ therm*		
Per Therm Charge:	Block One:	First	250,000 therms transported @ $0.02393
	Block Two:	Next	500,000 therms transported @ $0.00846
	Block Three:	Over	750,000 therms transported @ $0.00260

*Includes temporary purchased gas cost adjustment of ($0.01968)

PURCHASED GAS COST ADJUSTMENT:

This tariff is subject to an adjustment for the cost of purchased gas as provided for in Rate Schedule PGA**.** This adjustment is incorporated into the calculation of the Cost of Gas stated on customer bills.

SERVICE CONDITIONS:

1. All natural gas service hereunder is subject to the General Service Provisions of the Company's Tariff, of which this Rate Schedule is a part.

2. This service does not include the cost of the customer's gas supply of the interstate pipeline capacity. The customer is responsible for procuring its own supply of natural gas and transportation to Intermountain's distribution system under this Rate Schedule.

3. The customer understands and agrees that the Company is not responsible to deliver gas supplies to the customer which have not been nominated, scheduled, and delivered by the interstate pipeline to the designated city gate.

4. The customer shall negotiate with the Company, a mutually agreeable Maximum Daily Firm Quantity (MDFQ), which will be stated in and in effect throughout the term of the service contract.

5. The monthly Demand Charge will be equal to the MDFQ times the Demand Charge rate. Demand Charge relief will be afforded to those T-4 customers when circumstances impacted by force majeure events prevent the Company from delivering natural gas to the customer's meter.