JEFFREY R. LOLL DEPUTY ATTORNEY GENERAL IDAHO PUBLIC UTILITIES COMMISSION PO BOX 83720 BOISE, IDAHO 83720-0074 (208) 334-0357 IDAHO BAR NO. 11675

Street Address for Express Mail: 11331 W CHINDEN BLVD, BLDG 8, SUITE 201-A BOISE, ID 83714

Attorney for the Commission Staff

## **BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY FOR THE AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR GAS SERVICE IN THE STATE OF IDAHO

CASE NO. INT-G-25-02

SEVENTH PRODUCTION REQUEST OF THE COMMISSION STAFF TO INTERMOUNTAIN GAS COMPANY

Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Jeffrey R. Loll, Deputy Attorney General, requests that Intermountain Gas Company ("Company") provide the following documents and information as soon as possible, but no later than <u>TUESDAY, JULY 29, 2025</u>.<sup>1</sup>

This Production Request is to be considered as continuing, and the Company is requested to provide, by way of supplementary responses, additional documents that it, or any person acting on its behalf, may later obtain that will augment the documents or information produced.

Please provide answers to each question, supporting workpapers that provide detail or are the source of information used in calculations, and the name, job title, and telephone number of

<sup>&</sup>lt;sup>1</sup> Staff is requesting an expedited response. If responding by this date will be problematic, please call Staff's attorney at (208) 334-0357.

the person preparing the documents. Please also identify the name, job title, location, and telephone number of the record holder.

In addition to the written copies provided as response to the requests, please provide all Excel spreadsheets and electronic files with formulas intact and enabled.

**REQUEST NO. 134:** Following up on the Company's response to Production Request No. 28, please provide invoices and other supporting documents for Staff's selected samples of legal expenses listed in the attached Excel file "Samples Legal Injury Damage (Confidential)."

**REQUEST NO. 135:** Following up on the Company's response to Production Request No. 23, please provide a detailed narrative of the incident, and provide invoices and other supporting documents for Staff's selected samples of injury and damage claims listed in the attached Excel file "Samples Legal Injury Damage (Confidential)."

**REQUEST NO. 136:** Following up on the Company's response to production Request No. 21, please provide invoices, receipts and other supporting documents for Staff's selected samples of FERC account expenses listed in the attached Excel file "PR 21 Samples". Please also provide the listed additional information requested below for the following:

- a. 843.7 Natural Gas Storage: please give a brief description of what work was done for each invoice;
- b. 863 Trans. Exp: please give a brief description of what work was done for each invoice;
- c. 880 Dist. Exp: please give a brief description of expense and why needed;
- d. 904 Uncollectible accounts: copy of policy and processes; and
- e. 910 Misc Customer Service: please give a brief description of N. Gyllenskog's position and duties.

**REQUEST NO. 137:** Please provide, in Excel format with all formulas intact, the supporting workpapers corresponding to the following tabs contained within the Excel file labeled Darrington Exhibits and Workpapers:

a. WP – Salary Expense Adjustment;

- b. WP Incentive Comp Adj; and
- c. WP 401(k) Adj.

**REQUEST NO. 138:** Please provide, in Excel format with all formulas intact, the supporting workpapers corresponding to each adjustment outlined in Company Witness Roerick's direct testimony, pages 16-17. Additionally, please include the calculations of each proposed adjustment in its separate column.

**REQUEST NO. 139:** In reference to the Company's response to Staff's Production Request No. 18, please provide the following:

- a. Supporting documentation explaining the basis or justification for each employee who received a base salary increase greater than 5% in either 2023 or 2024, effective for calendar year 2025. The response should include the reason for the increase and any applicable internal approvals or policies supporting the adjustment; and
- b. The number of hours worked in calendar years 2023 and 2024 by each employee within the regulatory department, or other departments, on matters pertaining to jurisdictions outside of Idaho (e.g. Washington, Oregon).

**REQUEST NO. 140:** Please provide, in Excel format, a transaction report of all advertising-related expenditures categorized under Sales and Customer Service.

**REQUEST NO. 141:** In reference to the Company's response to Staff's Production Request No. 21, please provide copies of the invoices for Staff's selected samples of FERC account expenses listed in the attached Excel file "Staff Selection from PR 21 2024 IGC FERC 930.2".

**REQUEST NO. 142:** In reference to the Company's response to Staff's Production Request No. 29, please provide a cost-benefit analysis demonstrating the value to customers resulting from the Company's efforts to build relationships with builders, contractors, city organizations, and through sponsorship of community events.

3

**DATED** at Boise, Idaho, this 15<sup>th</sup> day of July 2025.

21 Loll

Deputy Attorney General

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4

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS 15<sup>th</sup> DAY OF JULY 2025, SERVED THE FOREGOING **SEVENTH PRODUCTION REQUEST OF THE COMMISSION STAFF TO INTERMOUNTAIN GAS COMPANY**, IN CASE NO. INT-G-25-02, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

LORI BLATTNER DIR – REGULATORY AFFAIRS INTERMOUNTAIN GAS CO PO BOX 7608 BOISE ID 83707 E-MAIL: <u>lori.blattner@intgas.com</u> igcregulatory@intgas.com PRESTON N CARTER MEGANN E. MEIER GIVENS PURSLEY LLP 601 W BANNOCK ST BOISE ID 83702 E-MAIL: prestoncarter@givenspursley.com mem@givenspursley.com stephaniew@givenspursley.com

Alliance of Western Energy Consumers CHAD M. STOKES CABLE HUSTON LLP 1455 SW BROADWAY, SUITE 1500 PORTLAND, OR 97201 E-MAIL: <u>cstokes@cablehuston.com</u>

BRAD MULLINS E-MAIL: <u>brmullins@mwanalytics.com</u>

PATRICIA JORDAN, SECRETARY

FERC major	FERC major	Doc Co	FERC Minor	FERC Minor	Do Ty
402	Maintenance Expense	00048	843	Other Storage Maintenance	PV
402	Maintenance Expense	00048	843	Other Storage Maintenance	PV
402	Maintenance Expense	00048	843	Other Storage Maintenance	PV
402	Maintenance Expense	00048	843	Other Storage Maintenance	PV
402	Maintenance Expense	00048	843	Other Storage Maintenance	PV
402	Maintenance Expense	00048	843	Other Storage Maintenance	OV
402	Maintenance Expense	00048	843	Other Storage Maintenance	OV
402	Maintenance Expense	00048	843	Other Storage Maintenance	OV

<b>Document Number</b>	G/L Date	Batch Number	Bth Ty	Со	Account Number	<b>Business Unit</b>
333720	1/18/2024	2149921	٧	00048	48513.5300.28437	48513
336720	2/26/2024	2158370	V	00048	48513.5300.28437	48513
346851	6/30/2024	2192583	V	00048	48513.5300.28437	48513
356363	10/23/2024	2222634	٧	00048	48513.5300.28437	48513
361441	12/16/2024	2236169	V	00048	48513.5300.28437	48513
27781	7/24/2024	2198138	0	00048	48513.5211.28437	48513
27782	7/24/2024	2198138	0	00048	48513.5211.28437	48513
27782	7/24/2024	2198138	0	00048	48513.5211.28437	48513

Obj Acct	Sub	Sub-ledger	Sub Type	LT	Per No	FY	Amount	Units	
5300	28437			AA	1	24	1,304.17	0.00	
5300	28437			AA	2	24	2,593.18	0.00	
5300	28437			AA	6	24	1,304.17	0.00	
5300	28437			AA	10	24	1,304.17	0.00	
5300	28437			AA	12	24	1,304.17	0.00	
5211	28437			AA	7	24	2,771.00	2,771.00	
5211	28437			AA	7	24	3,329.00	3,329.00	
5211	28437			AA	7	24	11,431.00	11,431.00	

Explanation Alpha Name	Explanation -Remark-	Address Number
CHRISTENSEN INC	CUSTOMER 1008686	1590063
CHRISTENSEN INC	CUST NO. 1008686	1590063
CHRISTENSEN INC	CUST 1008686	1590063
CHRISTENSEN INC	CUST 1008686	1590063
CHRISTENSEN INC	CUST 1008686	1590063
ETHOS ENERGY FIELD SERVICES LL	NON OQ WORK AT JOY	1112229
ETHOS ENERGY FIELD SERVICES LL	NON OQ WORK AT JOY	1112229
ETHOS ENERGY FIELD SERVICES LL	NON OQ WORK AT ARIEL	1112229

## **Invoice Number**

0512916-IN 0539104-IN 0587993-IN 0614959-IN 0646912-IN

	Invoice Number	G/L Date	Sum of Amount
0124 MDUR Corp Dept Allocation		1/31/2024	24,100.95
0124 Other SS Dept Allocation		1/31/2024	498.38
0224 MDUR Corp Dept Allocation		2/29/2024	25,505.65
0324 MDUR Corp Dept Allocation		3/31/2024	44,435.76
IDAHO LIABILITY REFORM COALITI	2024-631	12/10/2024	1,500.00
IDAHO PROSPERITY FUND	1526	12/20/2024	5,000.00
NAMPA CHAMBER OF COMMERCE	7207	1/10/2024	945.00
CHAMBER OF COMMERCE GEM COUNTY	4277	1/20/2024	500.00