

SEC INTERROGATORY #1

INTERROGATORY

[C2-1-4, p.3]

Please add two columns to Table 1, providing Q1 through Q3 gross customer additions for both 2015 and 2016.

RESPONSE

The methodology for forecasting volumes and all inputs to the volumetric determination utilizes the last full year of actual data at the time that forecasts are developed for the rate application. This approach has been applied consistently for ratemaking purposes. For the 2017 forecast, actual data up to and including 2015 were utilized. From that standpoint, it is the Company's position that partial year information is not indicative of full year results, and is therefore not appropriately used to inform test year expectations.

Witness: F. Ahmad