Request No. AG 2-1:
Please provide electronic versions (working models with all related and referenced spreadsheet models and data) of Mr. Harrison's embedded cost of service study (gas) in Excel or Lotus 123 format. The electronic versions must contain all formulae and permit the recalculation of Mr. Harrison's results. Describe of how each model/spreadsheet was constructed and operates (identify key variables, inputs and outputs).

Response:
The requested documents are confidential and represent proprietary information including trade secrets of Management Applications Consulting, Inc. This information is being provided with a clear understanding that this information is to remain confidential and that disclosure to the public domain is strictly prohibited. An executed confidentiality agreement will be in place before the requested materials will be provided. The embedded cost study is being provided in Excel format, capable of executing on an IBM compatible personal computer operating in the Windows XP environment, running Office Professional XP, version 2002. MAC can provide no assurance that similar results will be obtained running under a different operating system or a different version of Microsoft Excel. As explained Mr. Harrison's direct testimony, the model is extremely complex, has no users' manual and is not designed for the novice user. The key variables for the model consist of external allocators and the individual line items shown in the "Total Company" column that comprise the elements of the Company's revenue requirements formulae. The model allocates costs to customer classes and, depending on the options selected by the user, develops functional costs study detail.

Person Responsible: James L. Harrison