

WYOMING PUBLIC SERVICE COMMISSION

Minutes of Regular Open Meeting
Tuesday, September 13, 2016
1:30 p.m.

Commissioners: Chairman Alan B. Minier
Deputy Chairman William F. Russell
Commissioner Kara Brighton

Bruce Asay, Associated Legal, Counsel for MDU Resources Group
Janelle Steiner, Assistant Treasurer, MDU Resources Group (by telephone)
Daniel Moylan, VP Financial Reporting and Planning, MDU Resources
Group (by telephone)
Mary Davison, Legal Analyst, MDU Resources Group (by telephone)

Commission Staff (CS): John Burbridge and Michelle Bohanan

REGULAR AGENDA

1. **Docket Nos. 20004-119-ES-16 and 30013-317-GS-16 (Record No. 14484). Application of MDU Resources Group, Inc. for authority to issue up to an additional one billion dollars (\$1,000,000,000) worth of MDU Resources securities. Commission to consider and act on Application.** Michelle Bohanan, CS, provided a technical *Memo* dated September 7, 2016. Bruce Asay, Counsel for MDU Resources, explained this application is similar to the 2014 application which expires on October 31, 2016, and was filed to replace it. He said the request is for authority to issue one billion dollars in securities and to allow for flexibility so the Company can obtain financing as it deems appropriate. He noted this authority would be effective through October 30, 2018. He said MDU also filed with the Federal Energy Regulatory Commission (FERC) and the request is consistent with Wyoming law and will not exceed the fair market value of its properties and businesses. There were no questions or comments. John Burbridge, Commission Counsel, recommended approval of the application effective from October 31, 2016, through October 30, 2018, by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

Prepared by: Barbara Tomlinson

Date of Next Open Meeting: Tuesday, September 27, 2016

ACCEPTED and APPROVED by the Commission on November 10, 2016.

Chairman Alan B. Minier

WYOMING PUBLIC SERVICE COMMISSION

Minutes of ETC Open Meeting
Thursday, September 22, 2016
9:00 a.m.

Commissioners: Chairman Alan B. Minier
Deputy Chairman William F. Russell
Commissioner Kara Brighton

Bruce Asay, Associated Legal Group, LLC, Counsel for Union Telephone Company (by telephone)

Walter Eggers, Holland and Hart, LLP, Counsel for Boomerang Wireless
Julia Redmond Carter, Regulatory and Compliance Officer, Boomerang Wireless (by telephone)

Kristen Lee, Director of Regulatory Affairs, CenturyLink

Commission Staff (CS): Steve Mink and Tom Wilson

REGULAR AGENDA

1. **Docket No. 70008-67-TA-16 (Record No. 14451). Union Telephone Company, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application and *Petition for Confidential Treatment*.** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Wilson explained Union is a rate of return and incumbent local exchange carrier (ILEC). He said the company met all Commission requirements in its filing. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petition* by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.
2. **Docket No. 62006-27-RA-16 (Record No. 14453). Union Telephone Company d/b/a Union Wireless, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application and *Petition for Confidential Treatment*.** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Wilson explained that Union Wireless is a division of Union Telephone and is a competitive local exchange carrier (CLEC). He noted there was one complaint logged which was resolved. He said the company provided responses regarding outreach, service and expenses. Wilson noted Union has 38 Lifeline customers. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petition* by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.
3. **Docket No. 62096-1-RA-16 (Record No. 14477). Application of Boomerang Wireless, LLC d/b/a enTouch Wireless for designation as an eligible telecommunications carrier in the State of Wyoming for the limited purpose of offering Lifeline service to qualified households. Commission to consider and act on Application.** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Walter Eggers, Boomerang's Counsel, explained this is the initial registration application for designation as a Lifeline only wireless carrier. He said the company is designated an active ETC in 24 states. Eggers stated

Boomerang has met all Commission requirements. Wilson asked if Boomerang was granted forbearance to operate as a reseller and Julia Redmond Carter, Boomerang's Regulatory and Compliance Officer, responded affirmatively; that it was a part of the application as Exhibit D. Wilson asked if quarterly reporting is acceptable to Boomerang and Eggers responded it was discussed and Boomerang has agreed to those conditions. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application with the conditions stipulated and granting the *Petition by Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

4. **Docket No. 62096-2-RA-16 (Record No. 14504). Boomerang Wireless, LLC d/b/a enTouch Wireless, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application.** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Walter Eggers, Boomerang's Counsel, explained this application was filed out of an abundance of caution. Wilson explained that the certification letter, due by October 1, 2016, can be issued even if Boomerang does not have a study area code from USAC in time. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petition by Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

5. **Docket No. 70000-1630-TA-16 (Record No. 14457). Qwest Corporation d/b/a CenturyLink QC, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application and *Petition for Confidential Treatment* filed on July 15, 2016; *Petition for Confidential Treatment* filed on August 30, 2016, and *Petition for Confidential Treatment* filed on September 9, 2016 (*Petitions*).** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Wilson explained the three CenturyLink applications were reviewed together and said each division generates more revenue and incurs more expenses every year in the State than the amount of federal support they receive. He also said CenturyLink received the Federal Communications Commission (FCC) updated high cost support model offer and turned it down but will continue to receive frozen high cost support until the auctions. Wilson said Commission Staff relied on annual report data to be able to publicly disclose some information. He said CenturyLink answered many data requests and provided a five-year plan although it is not subject to this requirement at the FCC level. He said the narrative is public and includes efforts to maintain and repair lines, universal service, upgrading facilities and replacing obsolete facilities. He said Centurylink provided information about service interruptions. There were no held orders noted. He said CenturyLink provided a response to ongoing service quality issues and how it will maintain existing facilities. Low income and tribal operations are proceeding well, Wilson stated, but with respect to Lifeline service, participation rates are low. He said with outreach and advertising it might improve. Kristen Lee, CenturyLink's Regulatory Affairs Director, provided details about expenditures and offered to discuss staff's concerns outside of open meeting and also to bring in planners next year to avoid timing issues. Deputy Chairman Russell asked Lee about data request 2.3, forecast investments to improve the plants in Zones 2 and 3. Lee responded the information was included in the application and is confident CenturyLink is taking a proactive approach to review access points before anything breaks. A discussion about investments regarding Lusk, Wheatland and Sybille Canyon ensued. She said for the purposes of ETC, the Company does not have anything to provide regarding future investments at a granular level because the budgets are set after the ETC hearing. Lee said that bringing fiber to Zones 2 and 3 would require a rate case to allow

the Company to recover costs. She said another option is to refuse federal funding and not have an ETC obligation. Commissioner Brighton reminded Lee CenturyLink has an obligation to serve and to meet Commission service quality requirements separate from the FCC. Lee said the Company understood that obligation. Chairman Minier expressed concern that deregulation provides CenturyLink incentives to spend in areas where it is under competitive threat and conserve where there is no competition. He said there should be discussion about operations and maintenance on a per line basis. Finally, Lee stated Lifeline pricing is still at one dollar per month as CenturyLink's billing system cannot bill zero. There were no further questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petitions* by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

6. **Docket No. 70003-176-TA-16 (Record No. 14449). CenturyTel d/b/a CenturyLink, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application and *Petition for Confidential Treatment* filed on July 15, 2016; *Petition for Confidential Treatment* filed on August 30, 2016, and a *Petition for Confidential Treatment* filed on September 9, 2016 (*Petitions*).** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Wilson explained the filing is complete with information requests responses and he also expressed an interest in more information on Medicine Bow in the future. He mentioned a typographical error on Page 9 of the *Memo*. Lee said information on Medicine Bow was lacking due to lack of investment. She said if there is investment next year, it will be added. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petitions* by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.
7. **Docket No. 70009-468-TA-16 (Record No. 14450). United Telephone Company of the West d/b/a CenturyLink, 2016 annual eligible telecommunications carrier certification. Commission to consider and act on Application and *Petition for Confidential Treatment* filed on July 15, 2016; *Petition for Confidential Treatment* filed on August 30, 2016, and *Petition for Confidential Treatment* filed on September 9, 2016 (*Petitions*).** Tom Wilson, CS, provided a technical *Memo* dated September 16, 2016. Wilson said the revised *Memo* corrected some data in the table and he stated all requirements were met. There were no questions or comments. Steve Mink, Commission Counsel, recommended approval of the application and granting the *Petitions* by *Order* by only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

Prepared by: Barbara Tomlinson

Date of Next Open Meeting: Tuesday, September 27, 2016

ACCEPTED and APPROVED by the Commission on November 10, 2016.

Chairman Alan B. Minier

WYOMING PUBLIC SERVICE COMMISSION

Minutes of Regular Open Meeting
Tuesday, September 27, 2016
1:30 p.m.

Commissioners: Chairman Alan B. Minier
Deputy Chairman William F. Russell
Commissioner Kara Brighton

Bruce Asay, Counsel, Associated Legal Group, LLC, Counsel for Pinedale
Natural Gas (PNG) and Town of Walden
Steve Shute, President, PNG (by telephone)
Dustin Braeger, Assistant, PNG (by telephone)
Mayor Jim Dustin, Town of Walden
Duke Behrens, Accountant, Town of Walden
Martell Brower, Director of Gas Operations, Lower Valley Energy (LVE)
(by telephone)
Wade Hirschi, CFO, LVE (by telephone)
Meg McGill, Principal Analyst, Black Hills Energy (BHE)(by telephone)
Linden Barney, CFO, Fall River (by telephone)
Jerrad Hammer, Director of Regulatory Services, Black Hills Gas
Distribution (BHGD) (by telephone)
Tamie Aberle, Director of Regulatory Affairs, MDU (by telephone)
Kelly Mendenhall, Senior Corporate Counsel, Questar Gas Company
(QGC) (by telephone)
Jenniffer Nelson-Clarke, Corporate Counsel, QGC (by telephone)
Abby Thomas, Senior Engineer, QGC (by telephone)
Gordon Neumann, Engineering Manager, Wyoming Gas Company
(WGC) (by telephone)

Commission Staff (CS): Tom Wilson, John Burbridge, Marci Norby, Lori
Brand, Chris Petrie, Melisa Mizel, Rachel Meeker, Tom Wilson,
Shirley McCown, Kara Seveland, Michelle Bohanan. Marci Norby,
David Piroutek and Jacob Kilmurray

CONSENT AGENDA

1. **Docket No. 70003-175-TK-16 (Record No. 14431) Contract filing of CenturyTel of Wyoming, Inc. d/b/a CenturyLink for a commercial mobile radio services Interconnection Agreement with New Cingular Wireless PCS, LLC. Commission to consider and act on Agreement.** Tom Wilson, CS, provided a technical *Memo* dated September 12, 2016.
2. **Docket No. 30022-274-GK-15 (Record No. 14463) Contract filing of Black Hills Gas Distribution d/b/a Black Hills Energy of Gas Purchase Contract for the Choice Gas Program year ending May 31, 2017. Commission to consider acceptance of contracts for filing and consider and act on *Petition for Confidential Treatment of Attachments B, C and D (Petition)*.** Marci Norby, CS, provided a technical *Memo* dated September 13,

2016.

3. **Docket No. 90000-128-XI-16 (Record No. 14475) Investigation by the Commission into the quality and reliability of essential telecommunications service provided by Qwest Corporation d/b/a CenturyLink QC in Zones 2 and 3 of the rural areas of Crook County, Wyoming. Commission to consider issuance of a *Special Order Authorizing One Commissioner and/or Presiding Officer to Conduct Public Hearing.***

Chairman Minier introduced the consent items. For Item #1 Lori Brand, Commission Counsel, recommended acceptance of the Agreement and for Item #2, she recommended acceptance of the contracts for filing and granting the *Petition*, by *Letter Order*, effective immediately. For Item #3, she recommended issuance of a *Special Order* by *Order* only, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

REGULAR AGENDA

1. **Docket No. 30016-80-GP-16 (Record No. 14500). Application of Pinedale Natural Gas, Inc., for authority to pass on a wholesale gas cost increase of \$0.075 per therm through its Commodity Balancing Account. Commission to consider and act on Application.** Michelle Bohanan, CS, provided a technical *Memo* dated September 20, 2016. Bruce Asay, PNG's Counsel, explained this is the Company's semi-annual pass on application resulting in an increase. He said the adjustment is due to a change in gas costs and to reflect periodic payments made for unbilled gas. There were no questions or comments. Lori Brand, Commission Counsel, recommended approval of the application for usage on and after September 28, 2016, by *Notice and Order*, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.
2. **Docket No. 30019-33-GP-16 (Record No. 14501). Amended Application of the Town of Walden for authority to pass on a wholesale gas cost decrease of \$0.569 per dekatherm through its Commodity Balancing Account. Commission to consider and act on Amended Application.** Michelle Bohanan, CS, provided a technical *Memo* dated September 21, 2016. Bruce Asay, Town of Walden's Counsel, explained an adjustment was made to the original application and the caption changed to reflect the new amount, resulting in a smaller decrease. Deputy Chairman Russell asked if the change in pipeline service cost is related entirely to volumes. Asay responded it was. There were no other questions or comments. Katie Koski, Commission Counsel, recommended approval of the amended application for usage on and after October 1, 2016, by *Notice and Order*, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.
3. **Docket No. 30005-217-GP-16 (Record No. 14498). Application of Cheyenne Light, Fuel and Power Company d/b/a Black Hills Energy for authority to pass on a wholesale gas cost increase of \$0.2291 per dekatherm for firm and interruptible rate classes. Commission to consider and act on Application and *Petition for Confidential Treatment of Natural Gas Acquisition Strategy and Financial Forecasting (Petition).*** Kara Seveland, CS, provided a technical *Memo* dated September 15, 2016. Meg McGill,

BHE's Principal Analyst, explained this application is for a change to the gas cost reconciled rate. She said the purpose is to adjust for natural gas and commodity related costs, resulting in an increase. There were no questions or comments. John Burbridge, Commission Counsel, recommended approval of the application for usage on and after October 1, 2016, and granting the *Petition by Notice and Order*, effective immediately. Deputy Chairman Russell moved to act as recommended. Commissioner Brighton seconded the motion and Chairman Minier concurred.

4. **Docket No. 90000-126-XO-16 (Record No. 14378). In the matter of the study by the Commission on its own motion of statewide Wobbe indices. Commission to receive presentation on the second quarter Wobbe study by Commission Staff and take such action as the public interest may require.** Marci Norby, Michelle Bohanan, David Piroutek and Jacob Kilmurray, CS, provided a technical *Memo* dated September 12, 2016.

SUMMARY OF COMPLIANCE

Utility	Measurement/Sampling Points/Sources and Areas	Chapter 3 § 1(c)(v) (Within 4% Deviation)	Chapter 3 § 1(c)(iv) Compliance	Detailed Map
Fall River Enterprises	1 source/1 area	TBD	No	No
Black Hills Gas Distribution	1 sampling pt/23 areas	Yes	Yes	No
Town of Walden	1 source/1 area (DDA)	Yes	Yes	Yes
Lower Valley Energy	3 sources/2 areas	Yes	Yes	Yes
Pinedale Natural Gas	1 source/1 area (DDA)	Yes	Yes	Yes
Montana-Dakota Utilities	19 measurement pts/8 area(zones)	Yes	Yes	Yes
Black Hills Northwest Gas Utility Company	4 or 5 sources/3 areas	TBD	TBD	Yes, but insufficient
Questar Gas Company	17 measurement pts/11 areas	Yes	Yes	Yes
Wyoming Gas Company	5 sources/7 areas	Partially	Yes	Yes
Frannie Deaver Utilities	3 sources/2 areas	Yes	Yes	No
Cheyenne Light Fuel & Power Company	7 measurement pts/3 areas	Yes	No	Yes, but insufficient
Black Hills Energy Northeast	11 sampling pts.	Yes	No	Yes, but insufficient

Fall River – Bohanan explained Fall River is working with its supplier to obtain the necessary information for reporting. She said the supplier has sent preliminary data. Commissioner Brighton asked if Fall River is planning to file a third quarter report. Linden Barney, Fall River's CFO, responded no, but anticipated compliance by the fourth quarter.

Black Hills Gas Distribution (BHE-BHGD) Bohanan explained the Company is currently using a single sampling point, but said it will eventually be able to identify separate sources for each area. Bohanan noted BHE-BHGD is working to establish indices for the Arapaho and Evansville areas. Using a weighted mean of first six months of the year, Bohanan said sampled gas was within the 4% allowable deviation. In the remaining areas, she stated the deviation exceeded 4%, but said the Company is collecting and reviewing data to update its index by early 2017. In Powder River, the Company relies on two production wells and, at times, has had to bring in a truckload of liquid natural gas (LNG). It continues to evaluate its supply options. With respect to compliance with Chapter 3 §1(c)(iv), the Company states it does not have information to provide the best data

necessary and is working to obtain it. Bohanan noted the map needs additional detail, but is an improvement over the last quarter. David Piroutek, CS, expressed his concern with Powder River. Jerrad Hammer, BHE-BHGD's Director of Regulatory Services, said there are still two delivery points without indices and a decision to file an application will be made shortly. He said test results are lagging in the Torrington area, but a data sharing agreement has been reached. He commented BHE-BHGD might have to add equipment to achieve more sampling points. Commissioner Brighton questioned why the Company can provide this level of information for Cheyenne Light Fuel and Power (BHE-CLFP), but not for the other areas. Hammer responded that the Casper system is more spread out than Cheyenne and each customer is receiving a somewhat different blend because of where the blend occurs. Commissioner Brighton asked Hammer to work through the specifics with Commission Staff and report on progress next quarter.

Town of Walden Bohanan said Walden utilized a single, unique gas source, serving a single area which is stable with little variation. She said the Town is preparing to file an application to establish a Wobbe Index and the data presented today was compared with the mean for the first six months of 2016. She said all gas delivered complied with the Commission Rules and Walden provided a good color coded map. Bruce Asay, Walden's Counsel, said a filing to establish the index should be completed this week. Commissioner Brighton asked how Walden is determining compliance with the rules and Asay was unable to respond. Commissioner Brighton stated the Commission wants this information in the third quarter report.

Lower Valley Energy (LVE) Bohanan said the Company reported results for two areas, Jackson and Afton. She said Jackson is served with pipeline gas and LNG, and Afton is served exclusively with LNG. She said the Company does not want to report purchases of LNG from its suppliers separately. Bohanan noted the Company has a pending application to establish Wobbe Indices. Bohanan noted it had been reporting the same heating values for both areas, but does not have the data to support those values. The Company has provided good maps that comply with Commission Rules. Martell Brower, Director of Gas Operations, commented LVE has been attempting to contact both Exxon and Merit to obtain more information, but they have not responded. Commissioner Brighton questioned how the Company can know it is meeting quality of service standards set by the Commission. Martell responded it has a chromatograph to obtain a good read out about the components of the LNG and is an option it can use for the next 10-12 months regularly to establish a good Wobbe Index. Commissioner Brighton said it would be preferable to obtain the data before it goes into the distribution system. Brower disagreed, noting better sample information would come from the mixture that is delivered to customers. Discussion ensued about what information would be best. Bohanan expressed interest in having more granularity of data so Commission Staff can understand what happens when the gas is mixed.

Pinedale Natural Gas (PNG) Bohanan said PNG has one source serving a single area, complies with Commission Rules, and has a good color coded map. Commissioner Brighton asked how PNG is determining compliance and Asay responded he will discuss with the Company to confirm gas is measured at the border station.

Montana-Dakota Utilities (MDU) Bohanan stated there are 19 measurement points serving eight zones and the gas is within the 4% allowable deviation. Because there are multiple delivery points in these zones, Commission Staff is working with the Company to determine how to appropriately present this information. She stated MDU complies with Commission Rules and has provided a color coded map, but continues to work to improve the detail. Tamie Aberle, MDU's Director of

Regulatory Affairs, explained that adding an overlay to the GIS data will provide a clearer view of each of the areas and will be completed by the third quarter.

Black Hills Northwest Wyoming Gas Utility (BHE-NW) Bohanan stated BHE-NW serves three areas through four or five unique gas sources which were not reported separately. Information that was provided indicates the gas is around the 4% allowable deviation and the Company is attempting to acquire test results to determine whether the gas is in compliance. She commented the map is not as good as it was in the first quarter and discussed adding detail for the third quarter. Hammer said this entity is not in the same GIS system, limiting the ability to create good maps. He requested guidance about using specific sources or just the final blends to determine the indices. Commissioner Brighton said the Commission would like to see both and said discussions should continue outside of this open meeting setting to clarify.

Questar Gas Company Bohanan stated Questar has 17 measurement points serving 11 areas. She commented Questar reported results are within the 4% allowable deviation and gas delivered complies with Commission Rules. She said the Company has provided helpful, detailed maps that show the distribution system.

Wyoming Gas Company (WGC) Bohanan said WGC has five gas sources that serve seven areas and five of the seven areas were within the 4% allowable deviation. She said local production is sampled once per month and tends to have a higher Wobbe Index, but the variations were anticipated. She said the Lake Creek gas has been deviating more than 4% since this index was established and has generally been increasing. The Company reported it was compliant and also provided a color coded map. Dave Piroutek, CS, expressed concern with the Lake Creek deviation growing at a regular pace. Gordon Neumann, WGC's Engineering Manager, commented that Lake Creek is served with gas from WBI Energy over which WGC has no control. Commissioner Brighton said it may be necessary to establish seasonal Wobbe indices for this area depending on the source of the pipeline. She then asked for thoughts on what Company can do with respect to the Grass Creek area. Neumann responded WGC might have to shut off one source of supply. Commissioner Brighton encouraged discussion with Commission Staff during the forbearance period to find solutions.

Frannie Deaver Utilities (FDU) Bohanan stated FDU has three gas sources serving two areas; two sources being local production consisting of six wells, and the third source is WBI. She said the current index was established from assumptions on which gas is flowing to which area, and then a spot sample is taken. She said these spot samples have shown the gas to be within the 4% allowable deviation. WBI, the third source supplier, has a lower Wobbe index than the local production. Bohanan said sampling more often has been discussed and some fine tuning of the indices should be done. Finally, she commented that the Company reported the gas delivered complied with Commission Rules. No maps were provided, but Commission Staff requested them in the next quarterly filing. No representatives were available for follow up questions.

Cheyenne Light Fuel and Power Company (BHE-CLFP) Bohanan stated BHE-CLFP has seven measurement points that serve three areas. She noted there is no established Wobbe index for Carpenter, Burns, and Pine Bluffs, but the Company anticipates filing an application in the near future. She said gas delivered compared to the weighted mean indicates it was within 4% allowable deviation. In the Cheyenne area, only one of the five sources was within the 4% allowable deviation and there has been some discussion the Wobbe index needs to be updated. She said it was investigating how it can acquire the test results to determine whether the gas is in

compliance. She commented the Company is working on the map. He responded that because of the way the system is laid out all sources are shown. Bohanan asked Hammer about the quality of data received. He said the Company is working on this and exploring either stricter terms in the contract or doing away with the source causing issues.

Black Hills Energy – North East (BHE-NE) Bohanan stated there are 11 gas sampling points and all were within the 4% allowable deviation. She noted the sampling points are not the same as the delivery points and the Company is working with the Commission Staff on how reporting should be structured. Bohanan said BHE-NE is investigating how it can acquire test results to ensure it complies with Commission Rules and is continuing to work on additional detail for the maps. Hammer added that he spoke with Anadarko about how to obtain a feed of this data and is close to resolving the issue.

John Burbridge, Commission Counsel, said no recommendation is required at this time but noted that as the study progresses, the Commission might require action. Chairman Minier commented consulting with commissions in other states about rural gas companies that have several supply sources and have little leverage or control might be beneficial. Burbridge said a benefit of this study is discovering previously unknown concerns, especially with respect to LNG.

Prepared by: Barbara Tomlinson

Date of Next Open Meeting: Thursday, September 29, 2016

ACCEPTED and APPROVED by the Commission on January 26, 2017.

Chairman Alan B. Minier