



SECTION 5 UPDATE

February 15, 2010

Northern Section 5 Filing



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- Northern's cost and revenue study demonstrates a \$63 million shortfall in revenue which equates to an 8% return on equity
 - The shortfall would be larger if Northern had not controlled costs on an annual basis to avoid a rate case
 - Costs were updated; no adjustments were made to cost factors such as capital structure, return or depreciation

Section 5 Cost and Revenue Studies



	Northern	NGPL Base Case	NGPL App. B	Great Lakes
	(\$millions)			
Cost of Service	\$597	\$928	\$2,000	\$263
Underrecovery	\$63	\$316*	\$1,400*	\$20
Cost-of-Service Factors				
Equity Ratio	53.73%	100%	100%	48.43%
Return	12%	13.47% (increased)	13.47% (increased)	13.225%
Transmission Depreciation Rates	1.5%	2.26% (increased from 1.8%)	2.26% (increased from 1.8%)	2.59%
Onshore Negative Salvage	0%	3.37% (increased from 0%)	3.37% (increased from 0%)	1.35% (increased from 0%)
Acquisition Adjustment	-	-	+\$1,100	-

*Exclusive of NGPL's fuel benefit

Potential Section 4

- Cost of Service Factor Increments
 - Depreciation Increase
transmission (0.5%), storage (1%) \$16 million
 - Negative Salvage (1%) \$28 million
 - Return Increase (1%) \$16 million
- Service Structure
- Rate Design

Cost Management

Northern has managed costs in an effort to avoid a rate case

- Staffing has been reduced from 1,086 employees in 2003 to 935 employees in the test period (14% reduction)
- Executed on two significant asset sales
 - Beaver – total rate base reduction of \$20 million and O&M reduction of \$8 million
 - Hugoton – total rate base reduction of \$55 million and O&M reduction of \$9 million. Loss on sale of \$29 million

Cost Increases

Northern has been able to avoid a rate case despite incremental investments and cost increases

- Non-revenue generating capital expenditures in excess of depreciation expense from the last rate case through 2009 was over \$200 million
- Underground storage expense for gas loss for the last two years was \$16 million annually
- Asset retirement obligations have increased from \$24 million to \$108 million and are projected to be spent by 2015 (last rate case assumed 2022)

Northern has Managed Risks

- Northern's last rate case included long-term Field Area to Demarc contracts. Currently, the Field Area is virtually unsold on a long-term basis
- Since the last rate case, Northern has absorbed all competitive discounts within existing rates
- Market growth has helped limit the current underrecovery
- Northern has managed operational storage price risk within existing rates

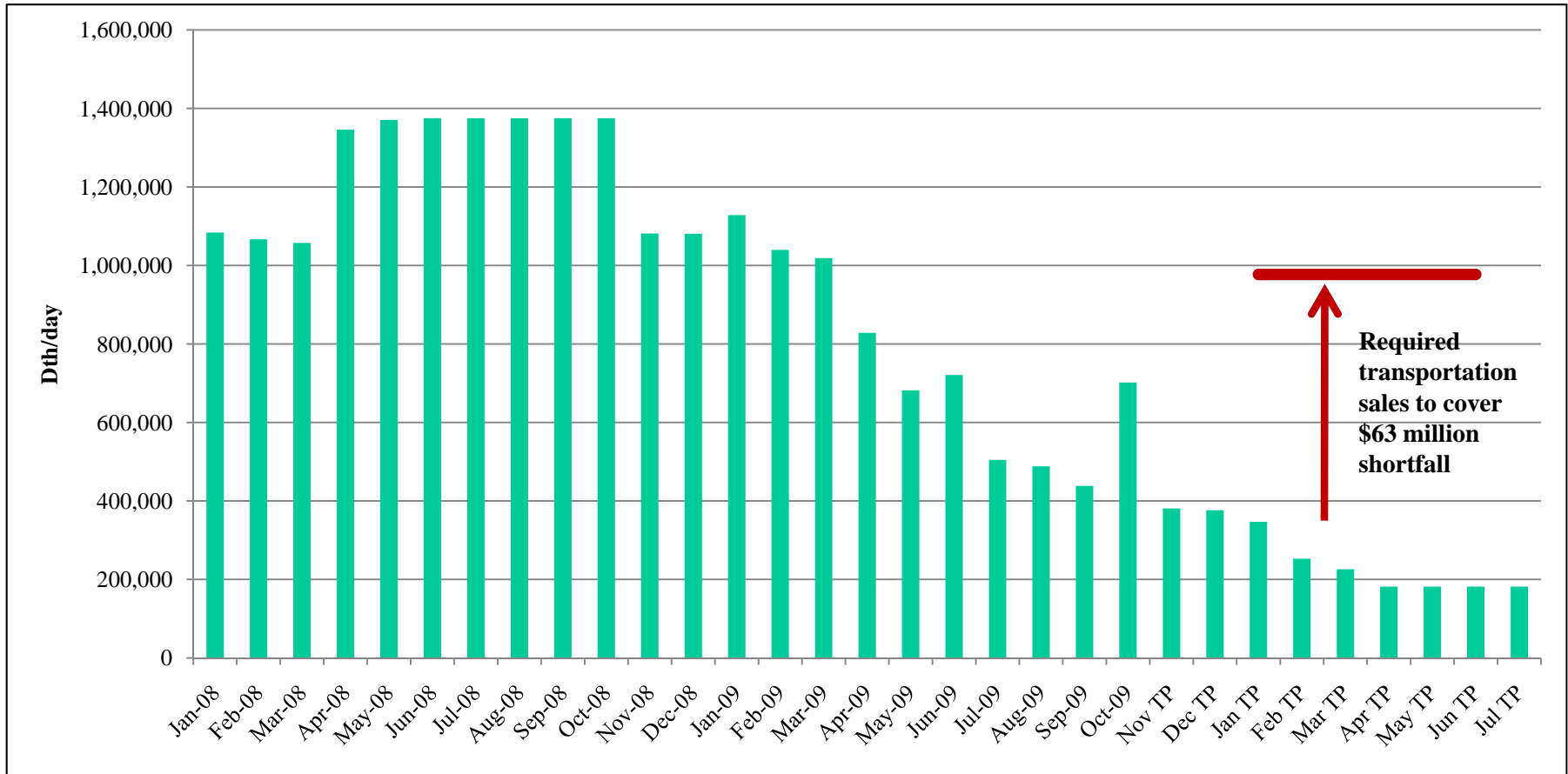
Market Changes



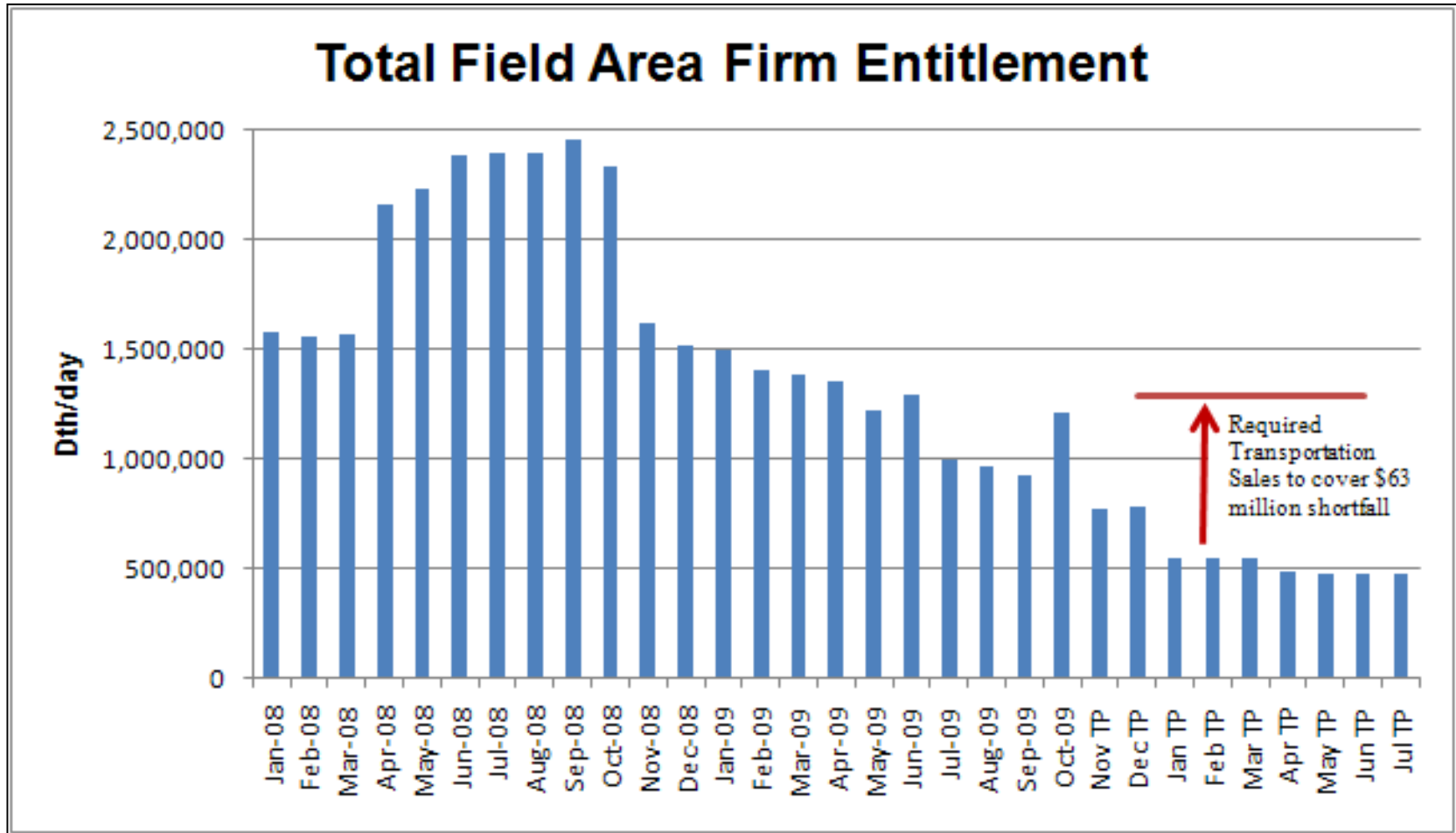
Market drivers and the lack of Field Area long-term contracts negatively impacted revenue causing Northern's \$63 million underrecovery

	Base Period vs. 2008 (\$million)	Test Period vs. Base Period (\$million)
Field Area	\$(53)	\$(78)
REX/TBPL	\$(4)	\$(20)
Storage	\$(6)	\$(19)
Market Area Short Term	\$(7)	\$(6)
Market Area Long Term	\$10	\$9

Field Area to Demarc Firm Entitlement



Total Field Area Business



Conclusion

- No basis for a Section 5 proceeding
- Northern and its customers will be forced to prosecute a case which would increase rates and cause service changes
- Is this what customers want