

IN THE MATTER OF THE PETITION OF
PIVOTAL UTILITY HOLDINGS INC. D/B/A
ELIZABETHTOWN GAS FOR APPROVAL OF
INCREASED BASE TARIFF RATES AND
CHARGES FOR GAS SERVICE AND
OTHER TARIFF REVISIONS

BPU DOCKET NO. GR09 _____

DIRECT TESTIMONY

OF

DONALD F. CARTER

On Behalf Of
Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas

Exhibit P-2

March 3, 2009

PIVOTAL UTILITY HOLDINGS, INC.
d/b/a ELIZABETHTOWN GAS
DIRECT TESTIMONY OF
DONALD F. CARTER

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. Donald F. Carter. My business address is 300 Connell
3 Drive, Suite 3000, Berkeley Heights, NJ 07922.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am Vice President and General Manager of Pivotal
6 Utilities Holdings, Inc. d/b/a Elizabethtown Gas
7 ("Elizabethtown", "ETG" or "the Company"). In that
8 capacity, I am responsible for the operations of
9 Elizabethtown.

10 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL AND EDUCATIONAL**
11 **QUALIFICATIONS.**

12 A. I graduated from Georgia Institute of Technology in 1984
13 with a Bachelor of Mechanical Engineering degree. In 1992,
14 I received a Masters in Business Administration from Brenau
15 University. I am also a Registered Professional Engineer
16 in the State of Georgia.

17 I was employed by Atlanta Gas Light Company in June 1984 as
18 an Engineer. I held various engineering positions and in
19 January 1995 was promoted to Chief Engineer for Atlanta Gas
20 Light. In April 1999, I was named Region Manager for
21 Atlanta Gas Light's Gwinnett operations. In December 2004,

1 I became Region Manager for Elizabethtown overseeing
2 operations in our Northwest New Jersey service area. I was
3 promoted to my current position in April 2005.

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. In support of Elizabethtown's base rate filing in this
6 proceeding I will describe the operational improvements
7 that Elizabethtown has and will continue to make in the
8 areas of customer service, pipeline safety and integrity,
9 and operational quality and reliability in order to provide
10 safe, adequate and reliable utility service. I will also
11 include a forecast and explanation of Elizabethtown's
12 capital expenditures for the (i) forecast portion of the
13 test year, which is the twelve months ending September 30,
14 2009, and (ii) the post-test year period, which is the
15 three months ending December 31, 2009. The twelve months
16 ending December 31, 2009 is the Company's 2009 fiscal year.
17 I will explain the Company's capital budgeting process and
18 how that process was used to develop the capital
19 expenditure forecast for the test year and post-test year
20 periods. I will also explain the steps Elizabethtown is
21 taking to meet Governor Corzine's call for New Jersey
22 energy utilities to play a roll in the broad economic
23 recovery of the State and to respond to the Global Warming
24 Response Act (otherwise known as the "RGGI Legislation"),

1 which calls for the reduction of greenhouse gas emissions
2 to 1990 levels by 2020. Finally, I will discuss certain
3 operation and maintenance expenses associated with
4 environmental remediation and energy efficiency that the
5 Company proposes to include in the rates to be established
6 in this proceeding.

7 **Q. DO YOU SPONSOR ANY SCHEDULES AS PART OF YOUR DIRECT**
8 **TESTIMONY?**

9 **A.** Yes. I sponsor Schedules DFC-1, DFC-2, and DFC-3, which
10 were prepared by me or under my supervision and direction.
11 Schedule DFC-1 sets forth Elizabethtown's actual capital
12 expenditures for the last three months of 2008, October
13 through December, and projected capital expenditures for
14 fiscal year 2009 (January 1, 2009 through December 31,
15 2009.) Schedule DFC-2 sets forth Elizabethtown's
16 performance under various operational metrics during the
17 period 2004-2008, and Schedule DFC-3 sets forth
18 Elizabethtown's safety performance during the same period.

19 **Q. PLEASE PROVIDE AN OVERVIEW OF ELIZABETHTOWN'S DISTRIBUTION**
20 **SYSTEM.**

21 **A.** Elizabethtown provides natural gas service in two areas of
22 New Jersey. The eastern portion of the service territory,
23 consisting of 131 square miles, covers portions of Union
24 and Middlesex Counties (the "Union Division"). The Union

1 Division is a relatively mature service area where the
2 majority of ETG's capital expenditures are made to replace
3 and upgrade an aging infrastructure. In fact,
4 Elizabethtown is currently into the fourth year of a 5-year
5 Pipeline Replacement Program ("PRP") developed to
6 accelerate the replacement of 8-inch elevated pressure
7 ("EP") cast iron pipelines. The majority of the 2009
8 capital expenditures related to pipeline replacements are
9 associated with completing the 8-inch PRP. The northwest
10 portion of the service territory (the "Northwest
11 Division"), consisting of 1,373 square miles, covers
12 portions of Sussex, Warren, Hunterdon, Mercer and Morris
13 Counties. The Northwest Division is a newer distribution
14 system that is experiencing more customer growth than the
15 Union Division. Most of this area's capital expenditures
16 are associated with new business and DOT/Municipal
17 relocation work.

18 **Q. HAS ELIZABETHTOWN MADE OPERATIONAL IMPROVEMENTS IN RECENT**
19 **YEARS?**

20 **A.** Yes. In the past few years, we have made several notable
21 operational improvements, especially in the areas of
22 pipeline safety and integrity, customer service,
23 operational quality and reliability. Since AGLR acquired
24 Elizabethtown in 2004, the Company has invested over \$124

1 million, in new capital to extend service, improve and
2 maintain the safety, reliability and integrity of the gas
3 distribution system, upgrade the tools and equipment used
4 by our field workforce, and conduct environmental
5 remediation. The Company has made these investments while
6 also holding rates steady for 6 years.

7 **Q. WHAT IMPROVEMENTS HAVE BEEN MADE TO PIPELINE SAFETY AND**
8 **INTEGRITY?**

9 A. The Company has made several improvements in this critical
10 area since 2004. In the past few years, an important part
11 of Elizabethtown's capital spending program has been
12 ongoing replacement of small and large diameter EP cast
13 iron main. In 2007, one year ahead of schedule,
14 Elizabethtown completed a program whereby it fully replaced
15 all of its 4 and 6 inch EP cast iron main. Beginning in
16 2006, Elizabethtown also increased its annual spending on
17 the replacement of large diameter EP mains in order to
18 replace all of its 8-inch EP cast iron main at a total cost
19 of approximately \$35 million. This replacement program
20 will be completed in 2009. These efforts have greatly
21 enhanced the reliability and integrity of the distribution
22 system. In addition, the Company has invested over \$13
23 million in pressure improvement projects to ensure the
24 reliability and integrity of the distribution system on the

1 coldest days. Finally, as I discuss more fully below, the
2 Company has recently filed a petition with the Board
3 requesting approval of an infrastructure enhancement
4 program in which the Company would increase its capital
5 expenditures on pipeline interconnects and replacements by
6 approximately \$60 million over the next two years, markedly
7 furthering our efforts in this essential area, as well as
8 helping to stimulate the New Jersey economy and reduce our
9 carbon footprint.

10 **Q. HOW HAS THE COMPANY IMPROVED THE QUALITY OF ITS OPERATIONS?**

11 A. We have improved operational quality in various ways. The
12 first improvement is in the area of meter reading. As
13 shown in Schedule DFC-2, we have completed the installation
14 of automated meter reading ("AMR") devices (also known as
15 Electronic Radio Transmitters or "ERTs") for over 97% of
16 the customers in our service territory. The AMRs have
17 greatly enhanced customer convenience because they have
18 eliminated the need for the meter reader to enter
19 customers' homes and businesses while also providing for
20 more consistent and accurate collection of information from
21 the gas meter. The installation of AMRs has allowed us to
22 transition from bi-monthly to monthly meter reading,
23 increasing monthly meter reads from an average of 49.2% to

1 96.6%. These efforts have helped to reduce annual
2 complaints to the BPU by 51% since 2004.

3 Second, we have implemented a Work Management System
4 for our distribution crews and will complete the deployment
5 of a Mobile Geographic Information System ("GIS") in early
6 2009. These systems enable the Company to improve
7 customer satisfaction by organizing and automating the work
8 in the field and making it more visible so that jobs can be
9 efficiently scheduled, tracked and completed. This means
10 we can better meet customer needs for maintenance and
11 repairs.

12 Finally, we upgraded our Mobility Automated Dispatch
13 System to improve our control over, and visibility of, our
14 first responders. This has enabled us to improve our
15 average leak response times as shown in Schedule DFC-2.

16 **Q. WHAT OTHER STEPS HAS ELIZABETHTOWN TAKEN TO IMPROVE**
17 **OPERATIONS?**

18 A. One of the Company's priorities since the acquisition has
19 been to improve employee safety and training. It is
20 critical to our business, and we work everyday to make our
21 Company safe and accident-free. The safety of our
22 employees and the public are of utmost importance. Among
23 the focuses of our efforts in this area are:

24 (i) educating employees on policies and procedures,

1 (ii) teaching employees safe working techniques such
2 as defensive driving skills,

3 (iii) implementing enhanced fire safety training, and

4 (iv) raising awareness through increased ethics
5 training.

6 These efforts have borne fruit. As shown in Schedule DFC-
7 3, on-the-job injuries have declined from 75 in 2004 to 6
8 in 2008, while motor vehicle accidents have been reduced
9 from 52 to 13 in the same period. We believe that these
10 efforts not only improve our financial performance, they
11 also contribute to an enhanced quality of life for our
12 employees and the communities we serve.

13 **Q. PLEASE DESCRIBE THE COMPANY'S CAPITAL BUDGETING PROCESS.**

14 **A.** The capital budgeting process is a compilation of
15 information from a number of key sources, both internal and
16 external to the Company, accumulated in the fall of each
17 year.

18 The Sales/Marketing department projects
19 Elizabethtown's new business growth in the residential,
20 commercial and industrial markets for the upcoming fiscal
21 year. This data is used to estimate expenditures necessary
22 to serve the forecast new business. This estimate is
23 reflected in the capital budget as the new business
24 component.

1 The Engineering department projects replacement
2 expenditures that will be required during the upcoming
3 fiscal year to maintain and improve the safety, reliability
4 and integrity of the distribution system. These types of
5 projects include all main and service replacements
6 including ongoing programs such as the 8-inch PRP, the
7 ongoing replacement of bare steel services as required by
8 the New Jersey Administrative Code, pressure improvement
9 projects resulting from system modeling and winter
10 operations, regulator and gate station upgrades, and
11 replacements and facility relocations due to government
12 highway, bridge and sewer work.

13 The Company's Field Operations department, supported
14 by the services company, analyzes and establishes the
15 budgets for tools and equipment, vehicles, meters and
16 regulators, property improvements and plant improvements.

17 Technology capital expenditures are analyzed and
18 budgeted by the services company with input from affected
19 Elizabethtown departments.

20 Elizabethtown's Vice President and General Manager,
21 the Managers of Field Operations, Engineering and
22 Construction, and representatives of the services company
23 review the proposed capital expenditures for reasonableness
24 and conformity to the upcoming fiscal year objectives.

1 Once approved by the aforementioned group, the capital
2 budget is submitted to senior management for review, and
3 upon its approval, to the AGLR Board of Directors.
4 Following formal adoption by the Board, actual expenditures
5 are monitored against the budget throughout the year.
6 Revisions to the adopted budget are also made from time to
7 time when necessitated by circumstances.

8 **Q. CAN YOU EXPLAIN HOW PROJECTS ARE PRIORITIZED THROUGH THE**
9 **CAPITAL BUDGET PROCESS?**

10 **A.** Yes. In prioritizing projects and expenditures, we first
11 determine the projects that are essential to the continued
12 provision of safe and reliable natural gas delivery service
13 as well as programs mandated by Board Order such as the 8-
14 inch PRP, Federal and State regulations, and Company
15 standards as outlined in our operating manuals.

16 **Q. HOW WERE THE FIGURES FOR BARE STEEL/CAST IRON REPLACEMENTS**
17 **SET FORTH ON SCHEDULE DFC-1 DERIVED?**

18 **A.** The figures for Bare Steel/Cast Iron Replacements are based
19 on the replacement of 17.6 miles of 8-inch elevated
20 pressure cast iron mains and appurtenant facilities
21 (services, meters, regulators) at a cost of \$13,205,000, as
22 required by the Board's Order concerning the PRP. The 17.6
23 miles will conclude the agreed-to replacement of all of the
24 8-inch EP cast iron main commenced in 2006. In addition,

1 approximately 200 unprotected steel services will be
2 replaced at a cost of \$500,000 as part of the 20% bare
3 steel service rule set forth in the New Jersey
4 Administrative Code. The cost figures are based on
5 estimates prepared by Elizabethtown's Engineering
6 department, which utilizes average unit costs to design,
7 permit, and construct said facilities.

8 **Q. HOW WERE FIGURES FOR THE "OTHER PLANT" SET FORTH ON**
9 **SCHEDULE DFC-1 DERIVED?**

10 **A.** The figures for the Other Plant budget category were
11 derived from infrastructure replacement projects broken out
12 as follows:

13 (i) DOT/Municipal replacements at a cost of \$2,270,000
14 are based on identified projects submitted to the Company
15 by governing authorities prior to the development of the
16 capital budget as well as estimates of historic spending on
17 DOT/Municipal projects that are not yet identified but will
18 materialize during the course of the fiscal year;

19 (ii) Pressure improvement replacements and upgrades at
20 a cost of \$1,615,000 are improvements needed to correct
21 inadequate system pressures identified by models or actual
22 field conditions during the previous winter. Also,
23 included are contingency dollars based on historic level of

1 spending on system pressure problems that have not yet been
2 identified, and

3 (iii) \$1,639,000 of Other Plant expenditures are for
4 system renewal projects identified after a review of 2008
5 distribution system performance, upgrades to regulator and
6 gate stations, and abandonment projects.

7 **Q. HOW WERE THE FIGURES FOR GAS OPERATIONS, FACILITIES AND**
8 **FLEET AND TECHNOLOGY EXPENITURES SET FORTH ON SCHEDULE DFC-**
9 **1 DERIVED?**

10 **A.** Gas Operations capital expenditures comprise \$1,382,000 for
11 periodic meter changes, \$350,000 for curb stop
12 installations on service lines where meter sets are located
13 inside the building, and \$1,425,796 for other support
14 projects which include \$720,000 for Electronic Radio
15 Transmitter ("ERT") maintenance and new ERT installations
16 on existing meters, \$525,796 on miscellaneous tools for
17 normal distribution operations, and \$180,000 to update the
18 field control units for the LNG plant.

19 Facilities expenditures include \$960,000 and \$400,000
20 for improvements to the Flemington and Green Lane service
21 centers respectively. These expenditures are necessary to
22 relocate the Flemington service center, which is located on
23 a former MGP site. The site is preliminarily scheduled to
24 begin remediation activities in mid 2010. Thus, the

1 Flemington service center relocation must be completed in
2 2009. The Green Lane expenditures are for renovations and
3 energy efficiency improvements at the facility such as HVAC
4 replacement, lighting improvements, etc.

5 Fleet expenditures include \$315,000 for the
6 replacement of obsolete large crew trucks.

7 Technology expenditures include \$204,384 for the
8 completion of the GIS facilities mapping system for the
9 Union Division and implementation of ELROY, the Company's
10 next generation leakage survey planning and tracking
11 application.

12 Finally, as described by Company witness Connie
13 McIntyre, the Company is proposing to locate a call center
14 in New Jersey. This effort will require \$1.747 million of
15 additional capital expenditures during 2009, which is
16 included in the capital expenditures budget set forth on
17 Schedule DFC-1. The capital expenditures are for
18 Information Technology, networking and telephone equipment,
19 build-out of the space and furniture.

20 **Q. PLEASE DESCRIBE HOW NEW CUSTOMER INFORMATION RECEIVED FROM**
21 **SALES/MARKETING IS USED TO DEVELOP THE NEW BUSINESS**
22 **CONSTRUCTION FORECAST SET FORTH ON SCHEDULE DFC-1.**

23 **A.** The Sales/Marketing Department provides projections to
24 Construction Operations (Con Ops) for new customer growth,

1 by customer type, for the Union and Northwest divisions of
2 our service territory. Con Ops uses these forecasts to
3 estimate the footage of main and number of services
4 required to serve these additional customers. Other than
5 specific projects or large industrial projects (that are
6 estimated in Engineering Design using similar estimating
7 criteria to those that are used for replacement projects)
8 historic unit costs and footages are used to calculate the
9 new business cost forecast. Historical construction costs
10 are adjusted by inflation factors and known or anticipated
11 labor and material cost increases.

12 **Q. ARE THERE OTHER PROJECTS OR PROPOSALS THAT COULD AFFECT THE**
13 **COMPANY'S CAPITAL BUDGET?**

14 A. Yes. Recently, the Company submitted two proposals to the
15 BPU related to the Governor's economic stimulus plan and
16 New Jersey's regional greenhouse gas initiative. These
17 items will, if approved, increase the Company's capital
18 budget in 2009 from that described above by \$20.4 million.
19 These expenditures are not included on Schedule DFC-1. As
20 part of the Utility Infrastructure Enhancement (UIE)
21 proposal, the Company is proposing the following
22 incremental projects, which are outside the scope of
23 projected normal capital expenditures and which will
24 enhance the safety, reliability, and integrity of the

1 Company's distribution system: (1) the replacement of
2 approximately 29 miles of 10 and 12-inch EP cast iron main
3 and appurtenant facilities in Union and Middlesex counties,
4 (2) the replacement of 40 miles of low pressure 4-inch cast
5 iron main and appurtenant facilities, (3) the construction
6 of six miles of 8-inch high pressure main between Franklin
7 Township and Sparta Township to eliminate a current one-way
8 feed to approximately 4,500 customers, (4) the construction
9 of 20 miles of 12-inch high pressure main between
10 Washington Township and the Town of Newton to eliminate the
11 dependency of 7,500 customers on a single source of
12 interstate natural gas pipeline supply and (5) the
13 replacement of two heaters at the Company's Sussex and
14 Cloverleaf gate stations. The total incremental capital
15 investment required to complete these projects by March 31,
16 2011 is projected to be \$60.4 million, of which \$20.2
17 million is projected to be spent in 2009.

18 A significant feature of the RGGI program is the
19 development and introduction of a Conservation and
20 Efficiency Dashboard. This will be an on-line tool for
21 customers that provides in-depth information about their
22 natural gas bills on a recurring basis to help them better
23 understand their usage patterns and the impacts of energy
24 efficiency measures they may be contemplating. The

1 incremental capital investment for 2009 is estimated at
2 approximately \$220,000.

3 **Q. WHAT STEPS IS ELIZABETHTOWN TAKING TO MEET THE RGGI GOALS**
4 **MANDATED BY THE STATE?**

5 A. Elizabethtown has recently filed several energy efficiency
6 programs, including the Conservation and Efficiency
7 Dashboard mentioned above. These programs are designed to
8 reduce the Company's carbon footprint, while also helping
9 customers to reduce usage and lower their gas bills. The
10 proposed programs complement or supplement offers contained
11 in the existing New Jersey Clean Energy Programs (NJCEP)
12 and include enhanced customer education and outreach to
13 raise awareness of the importance of conservation and the
14 programs available to help conserve natural gas and lower
15 energy bills. They also have the beneficial effect of
16 creating additional jobs in the energy efficiency market.
17 The programs comprise six initial programs that will be
18 offered for a two year period and two base programs that
19 will be implemented on a longer term basis. The total
20 estimated cost over the two year period for the initial
21 programs is \$10.5 million and \$4.2 million for the base
22 programs.

23 **Q. IS ELIZABETHTOWN SEEKING RECOVERY OF THE COSTS OF ANY OF**
24 **THESE PROGRAMS IN THIS CASE?**

1 A. Yes. Elizabethtown is seeking to recover
2 (i) the outreach and education costs associated with
3 year 2 of the base program, which are estimated to be
4 \$400,000 per year,
5 (ii) maintenance costs of \$77,000 per year for the
6 customer Dashboard, and
7 (iii) the cost of one position associated with the
8 ongoing administration of energy efficiency programs
9 projected at \$100,000 per year.

10 The Company's filing in this case does not provide for
11 recovery through base rates for the UIE or RGGI enhanced
12 programs, nor does it address potential spending required
13 to meet the goals reflected in the New Jersey Energy Master
14 Plan. The Company expects the costs associated with those
15 proposals to be handled through alternative mechanisms in
16 separate filings that have been made or will be made.

17 **Q. PLEASE DESCRIBE ANY CHANGES TO THE WAY IN WHICH THE COMPANY**
18 **RECOVERS ENVIRONMENTAL REMEDIATION COSTS?**

19 A. The Company manages environmental clean-up at six sites in
20 New Jersey under its environmental remediation program.
21 Historically, the internal labor costs associated with that
22 program have been recovered through the Remediation
23 Adjustment Clause. As part of its filing in this case, the
24 Company proposes to recover its internal labor costs

1 through base delivery rates. These costs are reflected in
2 Company witness Michael Morely's cost of service.

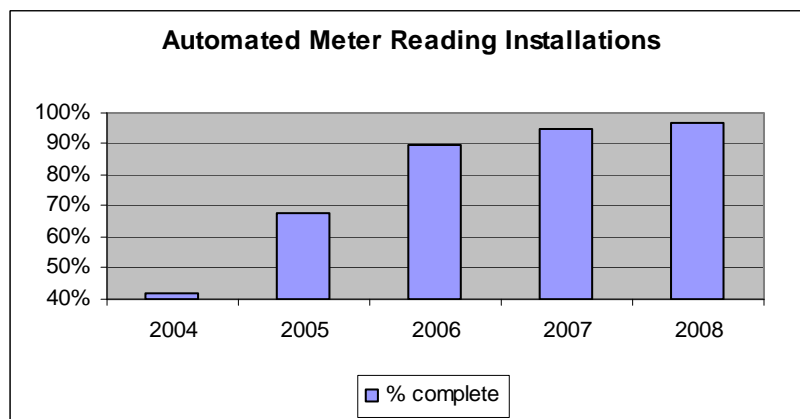
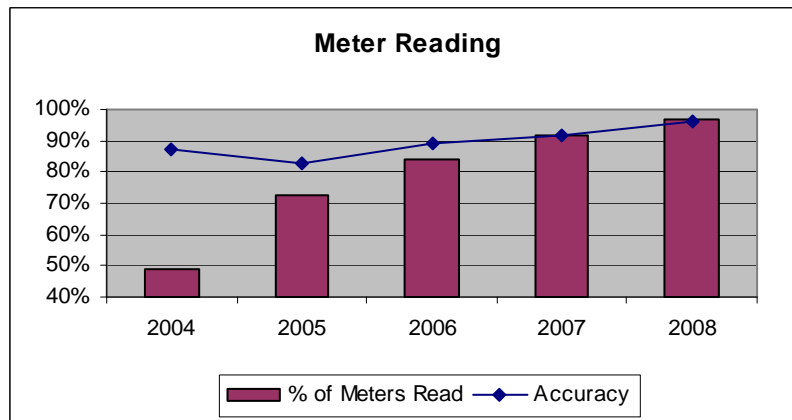
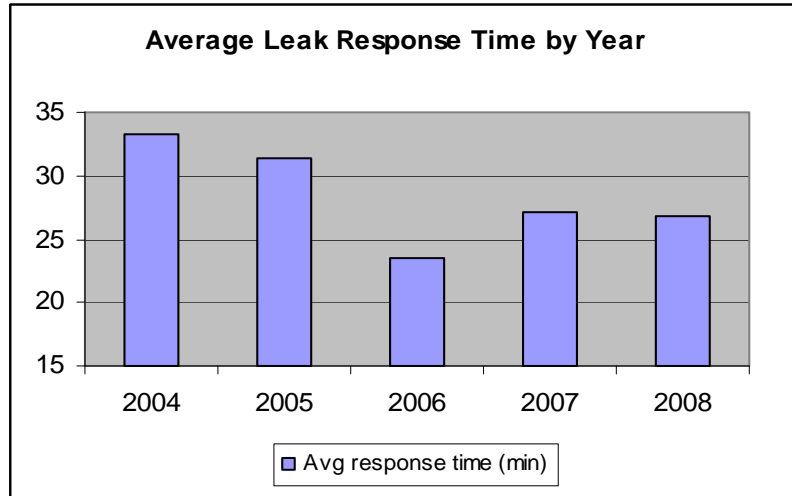
3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4 **A.** Yes, it does.

Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas
Actual and Projected Capital Expenditures

	2008 CapEx Actual		2009 CapEx Budget				Test Year	2009 CapEx Budget	
	(A)		(B)	(C)	(D)	(B+C+D)	(A+B+C+D)	(E)	(B+C+D+E)
	Qtr 4 2008	Total	Qtr 1 2009	Qtr 2 2009	Qtr 3 2009	Total	Total 10/01/2008 - 9/30/2009	Qtr 4 2009	Total 2009 CapEx Budget
Elizabethtown Gas Company									
Total CapEx	\$ 10,622,477	\$ 10,622,477	\$ 7,327,688	\$ 12,422,624	\$ 12,642,526	\$ 32,392,837	\$ 43,015,315	\$ 10,079,425	\$ 42,472,262
New Business Projects	\$ 2,917,333	\$ 2,917,333	\$ 2,551,547	\$ 2,660,058	\$ 2,584,619	\$ 7,796,224	\$ 10,713,557	\$ 3,149,408	\$ 10,945,632
Mandatory Projects	\$ 2,892,817	\$ 2,892,817	\$ 2,431,750	\$ 7,724,750	\$ 6,981,200	\$ 17,137,700	\$ 20,030,517	\$ 5,209,750	\$ 22,347,450
<i>Bare Steel/Cast Iron Replacement</i>	\$ 2,602,590	\$ 2,602,590	\$ 1,889,000	\$ 5,377,000	\$ 4,142,000	\$ 11,408,000	\$ 14,010,590	\$ 2,297,000	\$ 13,705,000
<i>MGP</i>	\$ 163,195	\$ 163,195	\$ 206,000	\$ 2,001,000	\$ 2,502,450	\$ 4,709,450	\$ 4,872,645	\$ 2,551,000	\$ 7,260,450
<i>PT Meters</i>	\$ 127,033	\$ 127,033	\$ 336,750	\$ 346,750	\$ 336,750	\$ 1,020,250	\$ 1,147,283	\$ 361,750	\$ 1,382,000
Abandonment Projects	\$ 273,378	\$ 273,378	\$ 3,500	\$ 10,500	\$ 10,500	\$ 24,500	\$ 297,878	\$ 10,500	\$ 35,000
Strategic Projects	\$ (13,289)	\$ (13,289)	\$ 87,510	\$ 87,510	\$ 87,510	\$ 262,530	\$ 249,241	\$ 87,470	\$ 350,000
Business Support Projects	\$ 4,008,343	\$ 4,008,343	\$ 1,998,797	\$ 1,575,006	\$ 2,053,697	\$ 5,627,499	\$ 9,635,842	\$ 1,287,297	\$ 6,914,796
<i>Relocations</i>	\$ 326,446	\$ 326,446	\$ -	\$ -	\$ -	\$ -	\$ 326,446	\$ -	\$ -
<i>Other</i>	\$ 636,535	\$ 636,535	\$ 273,997	\$ 442,806	\$ 334,497	\$ 1,051,299	\$ 1,687,834	\$ 374,497	\$ 1,425,796
<i>DOT</i>	\$ 66,817	\$ 66,817	\$ 857,000	\$ 193,000	\$ 400,000	\$ 1,450,000	\$ 1,516,817	\$ 820,000	\$ 2,270,000
<i>PRIM</i>	\$ 2,737,219	\$ 2,737,219	\$ 635,000	\$ 400,000	\$ 580,000	\$ 1,615,000	\$ 4,352,219	\$ -	\$ 1,615,000
<i>Renewals</i>	\$ 241,326	\$ 241,326	\$ 232,800	\$ 539,200	\$ 739,200	\$ 1,511,200	\$ 1,752,526	\$ 92,800	\$ 1,604,000
Fleet Projects	\$ 364,667	\$ 364,667	\$ 128,200	\$ 186,800	\$ -	\$ 315,000	\$ 679,667	\$ -	\$ 315,000
Facilities Projects	\$ 144,605	\$ 144,605	\$ -	\$ 100,000	\$ 925,000	\$ 1,025,000	\$ 1,169,605	\$ 335,000	\$ 1,360,000
Information Technology Projects	\$ 34,624	\$ 34,624	\$ 126,384	\$ 78,000	\$ -	\$ 204,384	\$ 239,008	\$ -	\$ 204,384

Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas
Operational Metrics Results
2004 - 2008



Pivotal Utility Holdings, Inc.
 d/b/a Elizabethtown Gas
 Safety Metrics Results
 2004 - 2008

