

OFFICIAL
EXHIBITS

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED
October 31, 2023
INDIANA UTILITY
REGULATORY COMMISSION

PETITION OF THE BOARD OF DIRECTORS FOR)
UTILITIES OF THE DEPARTMENT OF PUBLIC)
UTILITIES OF THE CITY OF INDIANAPOLIS, AS)
SUCCESSOR TRUSTEE OF A PUBLIC)
CHARITABLE TRUST, FOR APPROVAL OF GAS) CAUSE NO. 37399 GCA-160
COST ADJUSTMENTS TO BE APPLICABLE IN THE)
MONTHS OF DECEMBER 2023, JANUARY AND)
FEBRUARY 2024)

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S

PUBLIC'S EXHIBIT NO. 1 – TESTIMONY OF OUCC WITNESS
LACRESHA N. VAULX

PUBLIC'S EXHIBIT NO. 2 – GCA-160 FACTOR CALCULATIONS

PUBLIC'S EXHIBIT NO. 3 – GCA-160 STATISTICAL CALCULATIONS

October 31, 2023

Respectfully submitted,



Matthew W. Kappus
Attorney No. 35807-49
Deputy Consumer Counselor

OFFICIAL EXHIBITS

PUBLIC'S EXHIBIT NO. 3 GCA 160 STATISTICAL CALCULATIONS

**CAUSE NO. 37399 GCA 160
CITIZENS GAS**

**IURC
PUBLIC'S**
EXHIBIT NO. 3
11-13-23 AT
DATE REPORTER

GENERAL INFORMATION:

Petition Filed: October 2, 2023
Update Filed: October 20, 2023
Hearing Date: November 13, 2023
Estimation Months: December 2023 through February 2024
Reconciliation Months: June through August 2023
Pipeline Transporters: Panhandle Eastern Pipeline Company, LP
Texas Gas Transmission, LLC
Heartland Gas Pipeline, LLC
Rockies Express Pipeline

ESTIMATION INFORMATION:

<u>December 2023</u>	Volumes in Dth	Commodity Cost per Dth	Percent of Total
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,590,440	\$3.5338	33.21%
Unnominated Seasonal Gas Purchases	900,000	\$3.1609	18.79%
Boil Off/Peaking Purchases	42,263	\$3.6580	0.88%
Storage Withdraw - (Net)	2,256,151	\$3.0740	47.11%
Total Purchases and Net Withdrawals	4,788,854	\$3.2482	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	4,788,854	\$3.2482	
 <u>January 2024</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,597,109	\$3.9835	29.78%
Unnominated Seasonal Gas Purchases	900,002	\$3.1609	16.78%
Boil Off/Peaking Purchases	42,263	\$3.8890	0.79%
Storage Withdraw - (Net)	2,824,185	\$3.0690	52.66%
Total Purchases and Net Withdrawals	5,363,559	\$3.3632	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	5,363,559	\$3.3632	
 <u>February 2024</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,468,396	\$3.8271	25.81%
Unnominated Seasonal Gas Purchases	900,001	\$3.1609	15.82%
Boil Off/Peaking Purchases	42,263	\$3.8200	0.74%
Storage Withdraw - (Net)	3,278,184	\$3.0851	57.62%
Total Purchases and Net Withdrawals	5,688,844	\$3.2941	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	5,688,844	\$3.2941	
 <u>Quarterly Total</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	4,655,945	\$3.7806	29.39%
Unnominated Seasonal Gas Purchases	2,700,003	\$3.1609	17.04%
Boil Off/Peaking Purchases	126,789	\$3.7890	0.80%
Storage Withdraw - (Net)	8,358,520	\$3.0767	52.76%
Total Purchases and Net Withdrawals	15,841,257	\$3.3036	100.0%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	15,841,257	\$3.3036	

BILL COMPARISONS
PROPOSED VS. CURRENTLY APPROVED GCA FACTORS

December 2023

Petitioner's Requested GCA Factor (\$/Dth) - December 2023	\$4.176
Current Commission Approved GCA Factor (GCA 159 - October 2023)	\$5.425
Increase (Decrease)	<u>(\$1.249)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	48.67	54.91	(\$6.24)	-11.36%
10	81.07	93.56	(\$12.49)	-13.35%
15	113.48	132.21	(\$18.73)	-14.17%
20	145.88	170.86	(\$24.98)	-14.62%
25	178.29	209.51	(\$31.22)	-14.90%

January 2024

Petitioner's Requested GCA Factor (\$/Dth) - January 2024	\$4.266
Current Commission Approved GCA Factor (GCA 159 - October 2023)	\$5.425
Increase (Decrease)	<u>(\$1.159)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	49.12	\$54.91	(\$5.79)	-10.54%
10	81.97	\$93.56	(\$11.59)	-12.39%
15	114.83	\$132.21	(\$17.38)	-13.15%
20	147.68	\$170.86	(\$23.18)	-13.57%
25	180.54	\$209.51	(\$28.97)	-13.83%

February 2024

Petitioner's Requested GCA Factor (\$/Dth) - February 2024	\$4.169
Current Commission Approved GCA Factor (GCA 159 - October 2023)	\$5.425
Increase (Decrease)	<u>(\$1.256)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	48.63	\$54.91	(\$6.28)	-11.44%
10	81.00	\$93.56	(\$12.56)	-13.42%
15	113.37	\$132.21	(\$18.84)	-14.25%
20	145.74	\$170.86	(\$25.12)	-14.70%
25	178.11	\$209.51	(\$31.40)	-14.99%

BILL COMPARISONS
PROPOSED VS. PRIOR YEAR APPROVED GCA FACTORS

December 2023

Petitioner's Requested GCA Factor (\$/Dth) - December 2023	\$4.176
Prior Year Commission Approved GCA Factor (GCA 156 - December 2022)	\$5.423
Increase (Decrease)	<u>(\$1.247)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$48.67	54.82	(\$6.15)	-11.22%
10	\$81.07	93.38	(\$12.31)	-13.18%
15	\$113.48	131.94	(\$18.46)	-13.99%
20	\$145.88	170.50	(\$24.62)	-14.44%
25	\$178.29	209.06	(\$30.77)	-14.72%

January 2024

Petitioner's Requested GCA Factor (\$/Dth) - January 2024	\$4.266
Prior Year Commission Approved GCA Factor (GCA 156 - January 2023)	\$5.547
Increase (Decrease)	<u>(\$1.281)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$49.12	55.45	(\$6.33)	-11.42%
10	\$81.97	94.63	(\$12.66)	-13.38%
15	\$114.83	133.82	(\$18.99)	-14.19%
20	\$147.68	173.00	(\$25.32)	-14.64%
25	\$180.54	212.19	(\$31.65)	-14.92%

February 2024

Petitioner's Requested GCA Factor (\$/Dth) - February 2024	\$4.169
Prior Year Commission Approved GCA Factor (GCA 156 - February 2023)	\$5.398
Increase (Decrease)	<u>(\$1.229)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$48.63	54.70	(\$6.07)	-11.10%
10	\$81.00	93.14	(\$12.14)	-13.03%
15	\$113.37	131.58	(\$18.21)	-13.84%
20	\$145.74	170.02	(\$24.28)	-14.28%
25	\$178.11	208.46	(\$30.35)	-14.56%

ANALYSIS OF PETITIONER'S SCHEDULE 6 VARIANCE CALCULATIONS

GCA	146	146	147	147	147	148	148	148	149	149	149	150
Month	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
Actual Gas Cost	12,791,023	12,620,659	7,383,182	4,317,200	2,906,287	1,331,877	1,368,247	1,630,453	2,062,291	5,105,853	8,250,758	14,609,825
Variance	(1,500,513)	(779,086)	(464,555)	(442,851)	179,518	(668,512)	(334,647)	(98,921)	(118,959)	(856,549)	(1,466,980)	(117,305)
Monthly % Variance	-11.73%	-6.17%	-6.29%	-10.26%	6.18%	-50.19%	-24.46%	-6.07%	-5.77%	-16.78%	-17.78%	-0.80%
12 Mo. Avg.	-5.19%	-5.16%	-8.29%	-9.01%	-8.60%	-9.39%	-9.18%	-9.07%	-8.99%	-8.88%	-10.12%	-8.97%
GCA	150	150	151	151	151	152	152	152	153	153	153	154
Month	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21
Actual Gas Cost	15,617,099	6,671,569	10,281,208	5,870,899	4,260,330	2,296,200	2,355,258	2,316,123	2,592,283	5,031,393	16,340,881	17,661,480
Variance	(929,916)	(10,622,328)	197,451	38,554	517,107	(214,791)	189,857	157,937	102,932	359,782	2,258,716	900,707
Monthly % Variance	-5.95%	-159.22%	1.92%	0.66%	12.14%	-9.35%	8.06%	6.82%	3.97%	7.15%	13.82%	5.10%
12 Mo. Avg.	-7.90%	-22.37%	-20.61%	-19.55%	-18.77%	-17.95%	-17.06%	-16.60%	-16.21%	-14.71%	-9.14%	-7.72%
GCA	154	154	155	155	155	156	156	156	157	157	157	158
Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Actual Gas Cost	27,273,365	22,452,418	16,109,922	9,076,457	3,599,642	3,521,330	2,056,117	5,229,040	4,610,291	7,777,595	18,680,683	29,738,958
Variance	(1,430,321)	321,587	684,995	(49,663)	1,420,223	469,569	(51,161)	2,170,973	2,832,132	765,600	(75,147)	4,873,740
Monthly % Variance	-5.24%	1.43%	4.25%	-0.55%	39.45%	13.33%	-2.49%	41.52%	61.43%	9.84%	-0.40%	16.39%
12 Mo. Avg.	-7.33%	2.86%	3.12%	2.97%	3.70%	4.20%	4.02%	5.47%	7.44%	7.58%	5.77%	7.95%
GCA	158	158	159	159	159	160	160	160	161	161	161	162
Month	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23
Actual Gas Cost	22,962,231	14,239,239	18,188,740	6,818,989	3,567,574	1,944,899	2,258,659	1,860,128				
Variance	(2,605,168)	(3,824,137)	2,292,009	(147,215)	(409,497)	(784,320)	(1,184,319)	(1,355,951)				
Monthly % Variance	-11.35%	-26.86%	12.60%	-2.16%	-11.48%	-40.33%	-52.43%	-72.90%				
12 Mo. Avg.	7.38%	4.81%	5.88%	5.91%	4.58%	3.71%	2.87%	0.28%				

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.



LaCresha N. Vaulx
Utility Analyst II
Indiana Office of
Utility Consumer Counselor
Cause No. 37399 GCA-160
Citizens Gas

10/31/2023

Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served upon the following parties of record in the captioned proceeding by electronic service on October 31, 2023.

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