

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**VERIFIED PETITION OF INDIANA GAS)
COMPANY, INC. D/B/A CENTERPOINT ENERGY)
INDIANA NORTH ("CEI NORTH") FOR) CAUSE NO. 37394 GCA-154
APPROVAL OF CHANGES IN ITS GAS COST)
ADJUSTMENTS IN ACCORDANCE WITH I.C. 8-1-)
2-42(g) and 8-1-2-42.3.)**

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S

**PUBLIC'S EXHIBIT NO. 1 – TESTIMONY OF OUCC WITNESS
LINDA M. DEVINE**

PUBLIC'S EXHIBIT NO. 2 – GCA-154 FACTOR CALCULATIONS

PUBLIC'S EXHIBIT NO. 3 – GCA-154 STATISTICAL CALCULATIONS

May 2, 2022

Respectfully submitted,



T. Jason Haas
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Deputy Consumer Counselor

PUBLIC'S EXHIBIT NO. 1
TESTIMONY OF OUCC WITNESS LINDA M. DEVINE

CAUSE NO. 37394 GCA 154
INDIANA GAS COMPANY, INC. d/b/a CENTERPOINT ENERGY
INDIANA NORTH ("CEI NORTH")

**INDIANA GAS COMPANY, INC.
D/B/A CENTERPOINT ENERGY INDIANA NORTH
CAUSE NO. 37394 GCA 154
TESTIMONY OF OUCC WITNESS LINDA M. DEVINE**

1 **Q: Please state your name and business address.**

2 A: My name is Linda M. Devine, and my business address is 115 West Washington Street,
3 Suite 1500 South, Indianapolis, IN 46204.

4 **Q: By whom are you employed and in what capacity?**

5 A: I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as a
6 Utility Analyst II of the Natural Gas Division. I have worked as a member of the
7 OUCC's Natural Gas Division since January 2022.

8 **Q: Have you previously testified before the Indiana Utility Regulatory Commission**
9 **("Commission")?**

10 A: Yes. I have testified in Gas Cost Adjustment ("GCA") cases and special contract cases.

11 **Q: What is the purpose of your testimony?**

12 A: The purpose of my testimony is to confirm the accuracy of calculations used to establish
13 the proposed GCA factors presented in Indiana Gas Company, Inc. d/b/a CenterPoint
14 Energy Indiana North's ("CEI North" or "Petitioner") Petition for Approval of its
15 proposed Gas Cost Adjustment in Cause No. 37394 GCA 154, to be applicable in the
16 billing cycles of June through August 2022.

17 **Q: Please describe the review and analysis you conducted to prepare your testimony.**

18 A: I reviewed the Petition, Direct Testimony, Schedules, Revised Schedules, Exhibits and
19 Workpapers submitted by Petitioner. Additionally, I reviewed CEI North's prior GCA
20 filings and prepared Public's Exhibit Nos. 2 and 3. Finally, I reviewed House Enrolled
21 Act 1002 ("HEA 1002" or "Act"), which was recently enacted by the Indiana

Legislature, and signed by Governor Holcomb on March 15, 2022.

Q: Please identify and explain Public's Exhibit No. 2.

A: Public's Exhibit No. 2 (GCA 154 Factor Calculations) presents numerical information provided and used by Petitioner in calculating the proposed GCA 154 monthly factors. This Exhibit consists of the following schedules:

- Schedule 1 – Determination of Gas Cost Adjustment Charge;
- Schedule 2 – Net Operating Income Statement (Unaudited);
- Schedule 3 – Calculation of Excess Earnings Bank;
- Schedule 4 – Calculation of Excess Earnings and Total Gas Cost Variance; and
- Schedule 5 – Calculation of Actual Gas Cost Variance.

Q: Please identify and explain Public's Exhibit No. 3.

A: Public's Exhibit No. 3 (GCA 154 Statistical Calculations) presents certain data used in calculating CEI North's GCA 154 proposed factors and the results of performing certain statistical calculations on that data. The data for these calculations was provided by CEI North in this and prior GCA petitions and will be verified by the OUCC during Petitioner's next annual review. The calculations reflected in Public's Exhibit No. 3 address the following areas:

- General information;
- Estimation information;
- Effects on typical residential customers; and
- Comparison of Petitioner's variances with actual gas costs.

1 **Q: Have you conducted an examination of Petitioner's books and records for this**
2 **GCA, in accordance with Indiana Code § 8-1-2-42(g)(2)?**

3 A: No. CEI North's GCA next scheduled annual review would normally be held in April
4 2022. However, due to timing issues, the OUCC will perform the annual review in CEI
5 North's GCA 155, to be filed in July 2022. As such, the OUCC has not performed an
6 examination, reviewed, or compiled procedures on CEI North's data. Since those
7 additional procedures have not yet been performed, it is important that Applicant's GCA
8 rates only be finalized after gas costs have been reconciled and the books and records
9 have been examined in accordance with Ind. Code § 8-1-2-42(g)(2).

10 **Q: Did CEI North's original testimony and exhibits for GCA 145, as filed on April 1,**
11 **2022 remove utility receipts tax ("URT") from the GCA rate calculations in**
12 **accordance with HEA 1002?**

13 A: No.

14 **Q: Did CEI North's revised testimony and exhibits for GCA 145, as filed on April 21,**
15 **2022 remove utility receipts tax ("URT") from the GCA rate calculations in**
16 **accordance with HEA 1002?**

17 A: Yes. HEA 1002 specifies that a regulated utility is to file a rate adjustment with the
18 Commission that adjusts the utility's rates and charges to reflect the repeal of the URT,
19 independent of any other matters related to the utility's revenue requirement, no later
20 than May 1, 2022.¹ Pending approval of the utility's filing by the Commission, the
21 related rate adjustment will take effect upon the effective date of the URT repeal, which
22 is July 1, 2022. The gas cost recovery for GCA 154 will occur during the months of
23 June, July, and August 2022. Thus, to comply with HEA 1002, Petitioner filed GCA
24 rate factor calculations including the URT for June 2002, and GCA rate factor

¹ HEA 1002, Section 15. I.C. §8-1-4.2(b).

1 calculations excluding the URT for July and August, 2022 as evidenced in Schedule 1,
2 page 2.

3 **Q: Were there any discrepancies in CEI North's original exhibits for GCA 154, as**
4 **filed on April 1, 2022?**

5 A: Yes. I noted the following discrepancies:

- 6 • On Schedule 3, CEI North reflected a charge of .0013 for the FERC Gas Annual
7 Charges instead of .0012 for the Transport Rate in Column E.
- 8 • Also on Schedule 3, the Fuel rates for Panhandle, REX, and Texas Gas were not
9 updated to the correct tariff rates.
- 10 • On Schedule 5, the ANR storage rate was calculated incorrectly for the month
11 of June 2022.

12 The OUCC contacted CEI North about these discrepancies via email, and CEI North
13 filed revised schedules on April 21, 2022.

14 **Q: Were there any discrepancies in CEI North's revised schedules for GCA 154, as**
15 **filed on April 21, 2022?**

16 A: No.

17 **Q: Do you agree with CEI North's calculation of the proposed GCA 154 as revised on**
18 **April 21, 2022?**

19 A: Yes. Based on the information provided by Petitioner in the schedules filed on April 21,
20 2022, the OUCC found nothing to indicate CEI North has not correctly calculated the
21 proposed GCA 154 factors in accordance with all applicable requirements

22 **Q: Does this conclude your testimony?**

23 A: Yes.

PUBLIC'S EXHIBIT NO. 2
GCA 154 FACTOR CALCULATIONS

CAUSE NO. 37394 GCA 154
INDIANA GAS COMPANY, INC. d/b/a CENTERPOINT ENERGY
INDIANA NORTH ("CEI NORTH")

PUBLIC'S EXHIBIT NO. 2
CAUSE NO. 37394 GCA 154
SCHEDULE 1

CEI NORTH
CAUSE NO. 37394 GCA 154
DETERMINATION OF GAS COST ADJUSTMENT CHARGE

Line No.		Jun-22	Jul-22	Aug-22
1	Non-Demand Gas Costs - Estimated	\$5,748,709	\$5,946,541	\$5,787,480
2	Less: Cost of Trans. Cust. Co. Use Volumes	80,981	66,929	48,730
3	Add: Commodity Variance	5,241,278	5,241,278	5,241,278
4	Less: Commodity Refunds	(890)	(890)	(890)
5	Total Commodity Cost to be Recovered through GCA	\$10,909,896	\$11,121,780	\$10,980,918
6	Sales Subject to GCA	1,130,000	1,130,000	1,130,000
7	Total Commodity Cost to be Recovered per Dth	\$9.653	\$9.840	\$9.716
8	Demand Cost per Dth:			
8a	Rate 210/220/229	3.358	3.358	3.358
8b	Rate 240	1.343	1.343	1.343
9	Demand Variance per Dth	0.007	0.007	0.007
10	Bad Debt Cost Component per Dth	0.035	0.036	0.035
11	Total GCA Charges			
11a	Rate 210/220/229	\$13.053	\$13.241	\$13.116
11b	Rate 240	\$11.038	\$11.226	\$11.101
12	GCA Factor Modified for Utility Receipts Tax			
12a	Rate 210/220/229	\$13.257	\$13.241	\$13.116
12b	Rate 240	\$11.211	\$11.226	\$11.101

PUBLIC'S EXHIBIT NO. 2
CAUSE NO. 37394 GCA 154
SCHEDULE 2

CEI NORTH
CAUSE NO. 37394 GCA 154
NET OPERATING INCOME STATEMENT
FOR THE TWELVE MONTHS ENDING FEBRUARY 28, 2022
(Unaudited)

<u>Line No.</u>		
1	OPERATING REVENUES	\$677,428,766
2	OPERATING EXPENSES	
3	Purchased Gas	301,056,809
4	Cost of Gas for Interdepartmental Sales	0
5	Maintenance of Manufactured Gas Production	0
6	Underground Storage Expenses	2,629,332
7	Transmission Expenses	8,243,864
8	Distribution Expense	52,338,753
9	Customer Accounts Expenses	13,666,534
10	Customer Service & Info Expenses	289,742
11	Sales Expenses	1,604,169
12	General and Administrative Expenses	41,404,457
13	Depreciation Expense	108,592,903
14	Taxes Other Than Income Taxes	24,232,965
15	Income Taxes	<u>10,664,397</u>
16	TOTAL OPERATING EXPENSES	<u>564,723,924</u>
17	NET OPERATING INCOME	<u><u>\$112,704,842</u></u>

PUBLIC'S EXHIBIT NO. 2
CAUSE NO. 37394 GCA 154
SCHEDULE 3

CEI NORTH
CAUSE NO. 37394 GCA 154
CALCULATION OF EXCESS EARNINGS BANK

Line No.	Month	Year	GCA No.	Net Operating Income	Authorized		Differential
1	February	2022	154	\$ 112,704,842	\$ 97,745,602		\$ 14,959,240
2	November	2021	153	99,424,435	105,657,491		(6,233,056)
3	August	2021	152	93,193,069	105,657,491	**	(12,464,422)
4	May	2021	151	92,536,277	103,049,074		(10,512,797)
5	February	2021	150	90,438,331	103,049,074	**	(12,610,743)
6	November	2020	149	93,816,568	100,755,052		(6,938,484)
7	August	2020	148	90,153,887	100,755,052	**	(10,601,165)
8	May	2020	147	91,484,314	97,936,937		(6,452,624)
9	February	2020	146	70,621,506	97,936,937	**	(27,315,431)
10	November	2019	145	62,398,789	95,378,179		(32,979,390)
11	August	2019	144	66,078,144	95,378,179	**	(29,300,035)
12	May	2019	143	65,072,223	91,378,819		(26,306,596)
13	February	2019	142	81,659,085	91,378,819	**	(9,719,734)
14	November	2018	141	77,950,151	88,297,507	**	(10,347,356)
15	August	2018	140	78,242,404	84,453,268		(6,210,864)
16	May	2018	139	79,584,615	84,453,268		(4,868,653)
17	February	2018	138	75,099,538	84,453,268	**	(9,353,730)
18	November	2017	137	70,858,760	81,105,185		(10,246,425)
19	August	2017	136	72,035,246	81,105,185	**	(9,069,939)
20	May	2017	135	71,258,694	78,075,123		(6,816,429)
21	Sum of Differentials						<u>\$ (233,388,631)</u>

** Authorized NOI increases approved in Cause No. 44430 TDSIC-6, TDSIC-7, TDSIC-8, TDSIC-9, TDSIC-10, TDSIC-11 TDSIC-12, TDSIC-13, and TDSIC-14.

PUBLIC'S EXHIBIT NO. 2
CAUSE NO. 37394 GCA 154
SCHEDULE 4

CEI NORTH
CAUSE NO. 37394 GCA 154
CALCULATION OF EXCESS EARNINGS AND TOTAL GAS COST VARIANCE

Line
No.

1	Net Operating Income (Loss) For the Twelve Months Ending February 28, 2022	\$112,704,842
2	Net Operating Income Granted in Cause No. 45468	<u>97,745,602</u>
3	Excessive Earnings (Deficit)	\$14,959,240
4	Cumulative Excess (Deficit) Earnings GCA 153	<u>(248,347,871)</u>
5	Cumulative Excess (Deficit) Earnings GCA 154	<u>(\$233,388,631)</u>
6	Excess Earnings Returned This Petition	\$0
7	Add Demand Variance:	
8	Variance From Cause No. 37394 GCA 151	(105,676)
9	Variance From Cause No. 37394 GCA 152	20,082
10	Variance From Cause No. 37394 GCA 153	113,172
11	Variance From Cause No. 37394 GCA 154	(2,829)
12	Add Commodity Variance:	
13	Variance From Cause No. 37394 GCA 151	15,261,338
14	Variance From Cause No. 37394 GCA 152	46,460
15	Variance From Cause No. 37394 GCA 153	(3,020)
16	Variance From Cause No. 37394 GCA 154	<u>419,056</u>
17	Total Gas Cost Variance	<u><u>\$15,748,583</u></u>

PUBLIC'S EXHIBIT NO. 2
CAUSE NO. 37394 GCA 154
SCHEDULE 5

CEI NORTH
CAUSE NO. 37394 GCA 154
CALCULATION OF ACTUAL GAS COST VARIANCE

Line No.		Oct-21	Nov-21	Dec-21	Total
1	Actual Cost of Gas Incurred	\$14,878,256	\$43,809,570	\$42,060,400	\$100,748,226
2	Actual Incremental Cost of Gas Billed Excluding Gross/Utility Receipts Tax	\$18,506,266	\$55,608,872	\$53,245,830	\$127,360,968
3	Dollar Amount of Gas Cost Variance				
	From Cause No. 37394, GCA 151	6,706,953	10,754,733	0	17,461,686
	From Cause No. 37394, GCA 152	0	0	14,651,070	14,651,070
4	Refund Dollars				
	From Cause No. 37394, GCA 151	(1,391)	(3,597)	0	(4,988)
	From Cause No. 37394, GCA 152	0	0	(8,268)	(8,268)
5	Gas Costs Recovered to be Reconciled With Actual Gas Cost Incurred	\$11,800,704	\$44,857,736	\$38,603,028	\$95,261,468
6	Commodity and Demand Gas Cost Variance Subtotal	\$3,077,552	(\$1,048,166)	\$3,457,372	\$5,486,758
7	Add: LIFO Adjustment				2,450,776
8	Add: Annual UAF Adjustment - LIFO Adjusted				0
9	Add: Bad Debt Gas Cost Adjustment				21,493
10	Add: Bad Debt Gas Cost Adjustment - LIFO Adjusted				22,285
11	Total Commodity and Demand Variance				\$7,981,312
12	Variance Allocated to GCA 154				\$416,227
13	Variance Allocated to GCA 155				1,392,419
14	Variance Allocated to GCA 156				4,436,412
15	Variance Allocated to GCA 157				1,736,254
16	Total Variance Allocation				\$7,981,312

**PUBLIC'S EXHIBIT NO. 3
GCA 154 STATISTICAL CALCULATIONS**

**CAUSE NO. 37394 GCA 154
INDIANA GAS COMPANY, INC. d/b/a CENTERPOINT ENERGY
INDIANA NORTH ("CEI NORTH")**

GENERAL INFORMATION:

**Petition Filed: April 1, 2022
Update Filed: April 21, 2022
Hearing Date: May 11, 2022
Estimation Months: June through August 2022
Reconciliation Months: October through December 2021
Pipeline Transporters: ANR Pipeline Company
Panhandle Eastern Pipeline Company
Rockies Express Pipeline
Texas Eastern Transmission Corporation
Texas Gas Transmission Corporation**

ESTIMATION INFORMATION:

<u>June-22</u>	Volumes in Dth	Commodity Cost per Dth	Percent of Total
Fixed Purchases	1,280,000	\$6.2259	32.85%
Index Purchases	2,616,632	\$6.6211	67.15%
Unnominated Seasonal Gas Usage (NNS)	0	\$0.0000	0.00%
Storage Withdrawals	0	\$0.0000	0.00%
Total Purchases and Withdrawals	3,896,632	\$6.4913	100.0%
Unnominated Seasonal Gas Payback (NNS)	(326,345)	\$4.2203	
Storage Injections	(2,385,000)	\$6.2031	
Net Purchased Gas	1,185,287	\$7.6963	
<u>July-22</u>			
Fixed Purchases	1,315,000	\$6.3020	32.84%
Index Purchases	2,688,713	\$6.7919	67.16%
Unnominated Seasonal Gas Usage (NNS)	0	\$0.0000	0.00%
Storage Withdrawals	0	\$0.0000	0.00%
Total Purchases and Withdrawals	4,003,713	\$6.6310	100.0%
Unnominated Seasonal Gas Payback (NNS)	(337,223)	\$4.2203	
Storage Injections	(2,480,000)	\$6.3429	
Net Purchased Gas	1,186,490	\$7.9182	
<u>August-22</u>			
Fixed Purchases	1,315,000	\$6.2998	32.85%
Index Purchases	2,688,331	\$6.6929	67.15%
Unnominated Seasonal Gas Usage (NNS)	0	\$0.0000	0.00%
Storage Withdrawals	0	\$0.0000	0.00%
Total Purchases and Withdrawals	4,003,331	\$6.5638	100.0%
Unnominated Seasonal Gas Payback (NNS)	(337,223)	\$4.2203	
Storage Injections	(2,480,000)	\$6.2983	
Net Purchased Gas	1,186,108	\$7.7851	
<u>Quarterly Total</u>			
Fixed Purchases	3,910,000	\$6.2763	32.85%
Index Purchases	7,993,676	\$6.7027	67.15%
Unnominated Seasonal Gas Usage (NNS)	0	\$0.0000	0.00%
Storage Withdrawals	0	\$0.0000	0.00%
Total Purchases and Withdrawals	11,903,676	\$6.5626	100.0%
Unnominated Seasonal Gas Payback (NNS)	(1,000,791)	\$4.2203	
Storage Injections	(7,345,000)	\$6.2825	
Net Purchased Gas	3,557,885	\$7.7999	

Estimated Quarterly Sales (Dth):

3,390,000

BILL COMPARISONS
PROPOSED VS. CURRENTLY APPROVED GCA FACTORS

June 2022

Petitioner's Requested GCA Factor (\$/Dth) - June 2022	\$13.257
Current Commission Approved GCA Factor (GCA 153 - 04/30/2022)	<u>\$7.179</u>
Increase (Decrease)	<u><u>\$6.078</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	\$96.92	\$66.57	\$30.35	45.59%
10	\$174.40	\$113.66	\$60.74	53.44%
15	\$251.88	\$160.75	\$91.13	56.69%
20	\$329.36	\$207.84	\$121.52	58.47%
25	\$406.84	\$254.93	\$151.91	59.59%

July 2022

Petitioner's Requested GCA Factor (\$/Dth) - July 2022	\$13.241
Current Commission Approved GCA Factor (GCA 153 - 04/30/2022)	<u>\$7.179</u>
Increase (Decrease)	<u><u>\$6.062</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	\$96.84	\$66.57	\$30.27	45.47%
10	\$174.24	\$113.66	\$60.58	53.30%
15	\$251.64	\$160.75	\$90.89	56.54%
20	\$329.04	\$207.84	\$121.20	58.31%
25	\$406.44	\$254.93	\$151.51	59.43%

August 2022

Petitioner's Requested GCA Factor (\$/Dth) - August 2022	\$13.116
Current Commission Approved GCA Factor (GCA 153 - 04/30/2022)	<u>\$7.179</u>
Increase (Decrease)	<u><u>\$5.937</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	\$96.22	\$66.57	\$29.65	44.54%
10	\$172.99	\$113.66	\$59.33	52.20%
15	\$249.77	\$160.75	\$89.02	55.38%
20	\$326.54	\$207.84	\$118.70	57.11%
25	\$403.31	\$254.93	\$148.38	58.20%

BILL COMPARISONS
PROPOSED VS. PRIOR YEAR APPROVED GCA FACTORS

June 2022

Petitioner's Requested GCA Factor (\$/Dth) - June 2022	\$13.257
Prior Year Commission Approved GCA Factor (GCA 150 - June 2021)	<u>\$6.345</u>
Increase (Decrease)	<u><u>\$6.912</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$96.92	\$61.57	\$35.35	57.42%
10	\$174.40	\$102.29	\$72.11	70.49%
15	\$251.88	\$143.02	\$108.86	76.12%
20	\$329.36	\$183.74	\$145.62	79.25%
25	\$406.84	\$224.46	\$182.37	81.25%

July 2022

Petitioner's Requested GCA Factor (\$/Dth) - July 2022	\$13.241
Prior Year Commission Approved GCA Factor (GCA 150 - July 2021)	<u>\$6.799</u>
Increase (Decrease)	<u><u>\$6.442</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$96.84	\$63.93	\$32.92	51.49%
10	\$174.24	\$106.92	\$67.32	62.96%
15	\$251.64	\$149.91	\$101.73	67.86%
20	\$329.04	\$192.91	\$136.13	70.57%
25	\$406.44	\$235.90	\$170.54	72.29%

August 2022

Petitioner's Requested GCA Factor (\$/Dth) - August 2022	\$13.116
Prior Year Commission Approved GCA Factor (GCA 150 - August 2021)	<u>\$6.885</u>
Increase (Decrease)	<u><u>\$6.231</u></u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$96.22	\$65.17	\$31.05	47.64%
10	\$172.99	\$108.59	\$64.40	59.30%
15	\$249.77	\$152.02	\$97.75	64.30%
20	\$326.54	\$195.44	\$131.10	67.08%
25	\$403.31	\$238.86	\$164.45	68.85%

ANALYSIS OF PETITIONER'S SCHEDULE 6 VARIANCE CALCULATION

GCA	139	139	139	140	140	140	141	141	141	142	142	142
Month	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
Actual Gas Cost	55,046,170	33,480,340	33,856,788	21,198,657	8,088,618	7,329,249	6,779,836	7,299,497	8,031,713	15,813,539	35,567,995	39,017,452
Variance	5,622,323	(1,005,078)	(4,503,536)	(2,566,122)	2,959,096	488,692	139,539	475,636	3,153,534	1,257,810	642,640	(631,418)
Monthly % Variance	10.21%	-3.00%	-13.30%	-12.11%	36.58%	6.67%	2.06%	6.52%	39.26%	7.95%	1.81%	-1.62%
12 Mo. Avg.	3.79%	2.98%	0.90%	-0.66%	0.02%	0.48%	0.55%	0.82%	1.29%	2.02%	2.51%	2.22%
GCA	143	143	143	144	144	144	145	145	145	146	146	146
Month	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
Actual Gas Cost	49,210,138	35,860,892	35,242,730	14,642,713	9,834,414	7,443,996	6,535,765	6,829,569	7,141,707	12,190,913	29,141,674	30,667,625
Variance	(12,290)	(896,777)	(1,747,933)	(638,014)	2,242,818	217,953	256,457	439,914	3,171,047	951,083	(3,024,767)	(152,292)
Monthly % Variance	-0.02%	-2.50%	-4.96%	-4.36%	22.81%	2.93%	3.92%	6.44%	44.40%	7.80%	-10.38%	-0.50%
12 Mo. Avg.	0.15%	0.19%	1.21%	1.97%	1.69%	1.59%	1.63%	1.62%	1.63%	1.54%	0.13%	0.33%
GCA	147	147	147	148	148	148	149	149	149	150	150	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	31,930,800	30,791,562	22,686,019	13,731,579	9,911,756	7,186,120	6,595,754	6,938,048	7,431,993	12,190,077	21,507,241	37,252,471
Variance	(500,191)	938,168	(698,566)	621,203	852,215	683,360	668,788	615,556	1,923,279	(524,251)	(2,711,593)	4,787,733
Monthly % Variance	-1.57%	3.05%	-3.08%	4.52%	8.60%	9.51%	10.14%	8.87%	25.88%	-4.30%	-12.61%	12.85%
12 Mo. Avg.	0.14%	0.97%	1.53%	2.14%	1.47%	1.69%	1.89%	1.97%	1.38%	0.67%	0.85%	3.20%
GCA	151	151	151	152	152	152	153	153	153	154	154	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	41,690,506	140,472,388	23,984,817	15,841,960	10,914,766	7,528,409	6,874,100	7,009,669	8,488,476	14,878,256	43,809,570	42,060,400
Variance	4,110,567	98,832,473	(2,410,731)	607,081	623,730	33,772	(401,878)	(306,854)	2,805,952	3,077,552	(1,048,166)	3,457,372
Monthly % Variance	9.86%	70.36%	-10.05%	3.83%	5.71%	0.45%	-5.85%	-4.38%	33.06%	20.68%	-2.39%	8.22%
12 Mo. Avg.	5.17%	33.32%	32.67%	32.46%	32.29%	32.06%	31.71%	31.43%	31.59%	32.41%	30.86%	30.09%

Note: Actual Gas Cost is the sum of Actual Demand Cost Incurred (line 4c) and Actual Commodity Cost Incurred (line 7) from Petitioner's Schedule 6.


Note: Variance is the Total Gas Cost Variance (line 11c) from Petitioner's Schedule 6.

AFFIRMATION

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



Linda Devine
Utility Analyst II
Indiana Office of
Utility Consumer Counselor
Cause No. 37394 GCA-154
CenterPoint Energy Indiana North



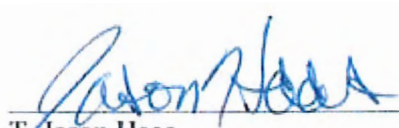
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served upon the following counsel of record in the captioned proceeding by electronic service on May 2, 2022.

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