

OFFICIAL
EXHIBITS

STATE OF INDIANA

FILED
October 30, 2024
INDIANA UTILITY
REGULATORY COMMISSION

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 164
COST ADJUSTMENTS TO BE APPLICABLE IN THE)
MONTHS OF DECEMBER 2024, JANUARY AND)
FEBRUARY 2025)

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 164 FACTOR CALCULATIONS

PUBLIC'S EXHIBIT NO. 3 – GCA 164 STATISTICAL CALCULATIONS

October 30, 2024

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR



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

OFFICIAL
EXHIBITS

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

CAUSE NO. 37399 GCA 164
CITIZENS GAS

IURC
PUBLIC'S
EXHIBIT NO. 1
DATE 11-14-24 REPORTER AT

**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, D/B/A CITIZENS GAS
CAUSE NO. 37399 GCA 164
TESTIMONY OF OUCC WITNESS LACRESHA N. VAULX**

I. INTRODUCTION

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

2 A: My name is LaCresha N. Vaulx, and my business address is 115 West Washington
3 Street, 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
6 a Utility Analyst. I have worked as a member of the OUCC’s Natural Gas Division
7 since January 2022.

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

10 A: Yes. I have testified in Gas Cost Adjustment (“GCA”) cases, rate cases,
11 Transmission, Distribution, and Storage System Improvement Charge tracker
12 filings, Federally Mandated Cost Adjustment tracker filings, Certificate of Public
13 Convenience and Necessity cases, and special contract cases involving gas utilities.

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

15 A: The purpose of my testimony is to confirm the accuracy of calculations the Board
16 of Directors for Utilities of the Department of Public Utilities of the City of
17 Indianapolis, as Successor Trustee of a Public Charitable Trust, d/b/a Citizens Gas
18 (“Citizens Gas” or “Petitioner”) used to establish the proposed GCA factors
19 presented in this Cause, to be applicable in the billing cycles of December 2024
20 through February 2025.

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

3 A: I reviewed Citizens Gas' Petition, Direct Testimony, Schedules, Exhibits and
4 Workpapers. I reviewed Citizens Gas' GCA filings for the past year, and prepared
5 Public's Exhibit Nos. 2 and 3.

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

7 A: Public's Exhibit No. 2 (GCA 164 Factor Calculations) presents Petitioner's
8 numerical information used in calculating the proposed GCA 164 monthly factors.

9 This Exhibit consists of the following schedules:

- 10 • Schedule 1 – Determination of Gas Cost Adjustment Charge for December
11 2024;
- 12 • Schedule 2 – Determination of Gas Cost Adjustment Charge for January 2025;
- 13 • Schedule 3 – Determination of Gas Cost Adjustment Charge for February 2025;
- 14 • Schedule 4 – Gas Cost Variance and Balancing Demand Variance; and
- 15 • Schedule 5 – Calculation of Actual Gas Cost Variance and Calculation of
16 Balancing Demand Variance.

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

18 A: Public's Exhibit No. 3 (GCA 164 Statistical Calculations) presents certain data used
19 in calculating Citizens Gas' GCA 164 proposed factors and the results of
20 performing certain statistical calculations on that data. Citizens Gas provided the
21 data for these calculations in this and prior GCA petitions. The calculations
22 reflected in Public's Exhibit No. 3 address the following areas:

- 23 • Estimation information;
- 24 • Effects on typical residential customers; and
- 25 • 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. Petitioner's GCA 164 quarterly filing falls between annual reviews; as such,
4 the OUCC has not performed examination or review procedures on this data. Since
5 those additional procedures have not yet been performed, it is important that
6 Petitioner's GCA rates only be finalized after gas costs have been reconciled and
7 the books and records have been examined in accordance with Ind. Code § 8-1-2-
8 42(g)(2). The OUCC's next scheduled examination or review of Petitioner's data
9 will be performed during GCA 166.

10 **Q: Were there any discrepancies in Citizens Gas' original exhibits for GCA 164,**
11 **as filed on October 2, 2024?**

12 A: No, there were not.

13 **Q: Do you agree with Citizens Gas' calculation of the proposed GCA 164 factors,**
14 **as filed on October 2, 2024?**

15 A: Yes. Based on information Petitioner provided in the Schedules filed on October 2,
16 2024, the OUCC found nothing to indicate Citizens Gas has not correctly calculated
17 the proposed GCA 164 factors in accordance with all applicable requirements.

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

19 A: Yes.

OFFICIAL
EXHIBITS

PUBLIC'S EXHIBIT NO. 2
GCA 164 FACTOR CALCULATIONS

CAUSE NO. 37399 GCA 164
CITIZENS GAS

IURC
PUBLIC'S
EXHIBIT NO. 2
DATE 11-14-24 REPORTER AT

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Dec-24

Line No.		Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	Commodity Costs	\$46,051	\$8,689,406	\$218,104	\$3,219,459	\$0
2	Add: Gas Cost Variance	(1,091)	(61,142)	(7,846)	(85,756)	0
3	Less: Refunds	2,291	432,297	10,851	160,168	0
4	Non-Demand Cost to be Recovered through GCA	\$42,669	\$8,195,967	\$199,407	\$2,973,535	\$0
5	Sales Subject to GCA (Dth)	16,685	3,148,633	79,031	1,166,579	0
6	Non-Demand Cost per Unit	\$2.557	\$2.603	\$2.523	\$2.549	\$0.000
7	Add: Retail Demand Cost Per Unit	0.480	0.569	0.280	0.533	0.000
8	Add: Balancing Demand Cost Variance per unit of throughput (D1 & D2 Only)	(0.006)	(0.004)	0.000	0.000	0.000
9	Add: Annual Balancing Demand Cost per Unit (D1 & D2 Only)	0.007	0.007	0.000	0.000	0.000
10	Net Write-Off Recovery Cost per Dth	0.041	0.047	0.005	0.012	0.000
11	Add: PEPL Unnominated Quantities Retail Cost Per Unit	0.131	0.164	0.028	0.157	0.000
12	Add: PEPL Balancing Costs Rates D1 & D2 Only	0.012	0.012	0.000	0.000	0.000
13	GCA Factor	\$3.222	\$3.398	\$2.836	\$3.251	\$0.000

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Dec-24

<u>Line No.</u>		<u>Rate D3/D7</u>	<u>Rate D4</u>	<u>Rate D5</u>	<u>Rate D9</u>
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.007	\$0.007	\$0.007	\$0.007
2	PEPL Balancing Demand Charge Per Unit of Throughput	0.0120	0.0120	0.0120	0.0120
3	Total Balancing Demand Cost Variance per unit of Throughput	<u>(0.0070)</u>	<u>(0.0040)</u>	0.0050	0.2900
4	Total Balancing Demand Charge Per Unit of Throughput	<u>0.012</u>	<u>0.015</u>	<u>0.024</u>	<u>0.309</u>
<u>Calculation of Basic Balancing Charge per Unit</u>					
5	Basic Balancing Charge per Unit	<u>0.001</u>	<u>0.001</u>	<u>0.001</u>	<u>0.015</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Dec-24

<u>Line</u> <u>No.</u>		
1	PEPL retail demand costs	\$152,263
2	Annual retail demand costs	<u>644,020</u>
3	Total retail demand costs	\$796,283
4	Estimated annual retail sales (Dths)	<u>1,245,610</u>
5	Back-up supply capacity charge per unit	<u>\$0.639</u>
6	PEPL monthly variable costs	\$33,023
7	Total monthly non-demand costs	<u>3,266,544</u>
8	Total retail non-demand costs	\$3,299,567
9	Estimated monthly retail sales (Dths)	<u>1,245,610</u>
10	Back-up supply commodity charge per unit	<u>\$2.649</u>
11	Total Back-up Gas Supply Charge	<u>\$3.288</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Jan-25

Line No.	Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	\$64,319	\$10,945,264	\$222,877	\$4,531,910	\$0
2	(1,457)	(73,611)	(7,663)	(115,380)	0
3	3,058	520,461	10,598	215,498	0
4	\$59,804	\$10,351,192	\$204,616	\$4,201,032	\$0
5	22,277	3,790,774	77,189	1,569,578	0
6	\$2.685	\$2.731	\$2.651	\$2.677	\$0.000
7	0.406	0.533	0.323	0.447	0.000
8	(0.006)	(0.004)	0.000	0.000	0.000
9	0.006	0.006	0.000	0.000	0.000
10	0.038	0.048	0.007	0.011	0.000
11	0.099	0.137	0.029	0.117	0.000
12	0.010	0.010	0.000	0.000	0.000
13	\$3.238	\$3.461	\$3.010	\$3.252	\$0.000

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Jan-25

<u>Line No.</u>	<u>Rate D3/D7</u>	<u>Rate D4</u>	<u>Rate D5</u>	<u>Rate D9</u>	
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.006	\$0.006	\$0.006	\$0.006
2	ADS 2 Balancing Demand Charge Per Unit of Throughput	0.0100	0.0100	0.0100	0.0100
3	Total Balancing Demand Cost Variance per unit of Throughput	(0.0070)	(0.0040)	0.0050	0.2900
4	Total Balancing Demand Charge	<u>\$0.009</u>	<u>\$0.012</u>	<u>\$0.021</u>	<u>\$0.306</u>
<u>Calculation of Basic Balancing Charge per Unit</u>					
5	Basic Balancing Charge	<u>\$0.000</u>	<u>\$0.001</u>	<u>\$0.001</u>	<u>\$0.015</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Jan-25

<u>Line</u> <u>No.</u>		
1	PEPL retail demand costs	\$152,263
2	Annual retail demand costs	<u>727,177</u>
3	Total retail demand costs	\$879,440
4	Estimated annual retail sales (Dths)	<u>1,646,767</u>
5	Back-up supply capacity charge per unit	<u>\$0.534</u>
7	PEPL monthly variable costs	\$33,748
8	Total monthly non-demand costs	<u>4,528,691</u>
9	Total retail non-demand costs	\$4,562,439
10	Estimated monthly retail sales (Dths)	<u>1,646,767</u>
11	Back-up supply commodity charge per unit	<u>\$2.771</u>
12	Total Back-up Gas Supply Charge	<u>\$3.305</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Feb-25

Line No.		Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	Commodity Costs	\$54,811	\$11,305,455	\$174,077	\$4,648,349	\$0
2	Add: Gas Cost Variance	(1,261)	(77,196)	(6,076)	(120,154)	0
3	Less: Refunds	2,646	545,804	8,404	224,412	0
4	Non-Demand Cost to be Recovered through GCA	\$50,904	\$10,682,455	\$159,597	\$4,303,783	\$0
5	Sales Subject to GCA (Dth)	19,273	3,975,362	61,213	1,634,512	0
6	Non-Demand Cost per Unit	\$2.641	\$2.687	\$2.607	\$2.633	\$0.000
7	Add: Retail Demand Cost Per Unit	0.311	0.337	0.270	0.285	0.000
8	Add: Balancing Demand Cost Variance per unit of throughput (D1 & D2 Only)	(0.006)	(0.004)	0.000	0.000	0.000
9	Add: Annual Balancing Demand Cost per Unit (D1 & D2 Only)	0.005	0.005	0.000	0.000	0.000
10	Net Write-Off Recovery Cost per Dth	0.043	0.045	0.008	0.010	0.000
11	Add: PEPL Unnominated Quantities Retail Cost Per Unit	0.109	0.124	0.035	0.107	0.000
12	Add: PEPL Balancing Costs Rates D1 & D2 Only	0.010	0.010	0.000	0.000	0.000
13	GCA Factor	\$3.113	\$3.204	\$2.920	\$3.035	\$0.000

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Feb-25

<u>Line</u> <u>No.</u>		<u>Rate</u> <u>D3/D7</u>	<u>Rate</u> <u>D4</u>	<u>Rate</u> <u>D5</u>	<u>Rate</u> <u>D9</u>
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.005	\$0.005	\$0.005	\$0.006
2	PEPL Balancing Demand Charge Per Unit of Throughput	0.0100	0.0100	0.0100	0.0100
3	Total Balancing Demand Cost Variance per unit of Throughput	<u>(0.0070)</u>	<u>(0.0040)</u>	<u>0.0050</u>	<u>0.2900</u>
4	Total Balancing Demand Charge	<u>\$0.008</u>	<u>\$0.011</u>	<u>\$0.020</u>	<u>\$0.306</u>
<u>Calculation of Basic Balancing Charge per Unit</u>					
5	Basic Balancing Charge	<u>\$0.000</u>	<u>\$0.001</u>	<u>\$0.001</u>	<u>\$0.015</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
DETERMINATION OF GAS COST ADJUSTMENT CHARGE
Feb-25

<u>Line</u> <u>No.</u>		
1	PEPL retail demand costs	\$142,544
2	Annual retail demand costs	<u>481,785</u>
3	Total retail demand costs	\$624,329
4	Estimated annual retail sales (Dths)	<u>1,695,725</u>
5	Back-up supply capacity charge per unit	<u>\$0.368</u>
6	PEPL monthly variable costs	\$34,350
7	Total monthly non-demand costs	<u>4,589,610</u>
8	Total retail non-demand costs	\$4,623,960
9	Estimated monthly retail sales (Dths)	<u>1,695,725</u>
10	Back-up supply commodity charge per unit	<u>\$2.727</u>
11	Total Back-up Gas Supply Charge	<u>\$3.095</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
GAS COST VARIANCE

Line No.		Allocation of Variance June 2024 through August 2024	Variance from Carry Forward			Variance for
		<u>Reconciliation (GCA 164)</u> Col. A	<u>GCA 161</u> Col. D	<u>GCA 162</u> Col. E	<u>GCA 163</u> Col. F	<u>this Petition</u> Col. G
1	Rate No. D1	(\$1,678)	(\$5,659)	(\$920)	\$4,448	(\$3,809)
2	Rate No. D2	(245,110)	(778,451)	(313,586)	1,125,198	(211,949)
3	Rate No. D3/D7	(37,859)	(16,074)	(22)	32,370	(21,585)
4	Rate No. D4	(148,852)	(301,042)	(207,898)	336,502	(321,290)
5	Rate No. D5	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
6	Total	<u>(\$433,499)</u>	<u>(\$1,101,226)</u>	<u>(\$522,426)</u>	<u>\$1,498,518</u>	<u>(\$558,633)</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
BALANCING DEMAND VARIANCE

Line No.		Allocation of Variance June 2024 through August 2024	Variance from Carry Forward			Variance for
		<u>Reconciliation (GCA 164)</u> Col. A	<u>GCA 161</u> Col. C	<u>GCA 162</u> Col. D	<u>GCA 163</u> Col. E	<u>this Petition</u> Col. G
1	Rate No. D1	(\$109)	(\$130)	(\$68)	(\$15)	(\$322)
2	Rate No. D2	(\$11,196)	(\$17,712)	(\$13,628)	\$2,629	(\$39,907)
3	Rate No. D3/D7	(\$3,421)	(\$2,559)	(\$267)	\$1,127	(\$5,120)
4	Rate No. D4	(\$10,657)	(\$12,509)	(\$4,614)	\$3,401	(\$24,379)
5	Rate No. D5	(\$1,135)	\$164	\$1,557	\$3,411	\$3,997
6	Rate No. D9	\$5,508	\$7,498	\$4,085	\$5,981	\$23,072
7	Total	<u>(\$21,010)</u>	<u>(\$25,248)</u>	<u>(\$12,935)</u>	<u>\$16,534</u>	<u>(\$42,659)</u>

CITIZENS GAS
CAUSE NO. 37399 GCA 164
CALCULATION OF ACTUAL GAS COST VARIANCE

Line No.	Jun-24	Jul-24	Aug-24	Total
	Col. A	Col. B	Col. C	Col. D
1	Cost of Gas to be Recovered through GCA			
	\$2,625,055	\$2,695,026	\$2,166,987	\$7,487,068
2	Actual Cost of Gas Billed Excluding Gross/Utility Receipts Tax			
	\$2,358,579	\$3,605,357	\$1,832,365	\$7,796,301
3	Net Write-Off Recovered			
	24,640	40,895	20,858	86,393
4	Dollar Amount of Gas Cost Variance From Cause No. 37399, GCA 162			
	(140,921)	(131,360)	(125,558)	(397,839)
5	Dollar Amount of Refund from From Cause No. 37399, GCA 162			
	69,436	61,134	59,427	189,997
6	Gas Cost Charge Revenues to be Reconciled with Cost of Gas Incurred			
	\$2,544,296	\$3,756,956	\$1,996,492	\$8,297,744
7	Gas Cost Variance			
	\$80,759	(\$1,061,930)	\$170,495	(\$810,676)
8	Annual Unaccounted for (Over)/Underrecovery			
				0
9	Net Write Off Gas Cost Variance			
				(4,035)
10	Total Gas Cost Variance			
				<u>(814,711)</u>
11	Variance Allocated to GCA 164			
				(\$433,499)
12	Variance Allocated to GCA 165			
				(216,724)
13	Variance Allocated to GCA 166			
				(53,805)
14	Variance Allocated to GCA 167			
				<u>(110,741)</u>
15	Total Variance Allocation			
				<u><u>(\$814,769)</u></u>

(1) The difference in the total gas cost variance between line 10 and line 15 is the stranded variance to Rate D5 in the amount of (\$58). Per the IURC order in GCA 128, potential recovery of the rate D5 variance shall be addressed in the utility's next base rate case.

CITIZENS GAS
CAUSE NO. 37399 GCA 164
CALCULATION OF ACTUAL BALANCING DEMAND VARIANCE

<u>Line No.</u>	<u>Jun-24</u> Col. A	<u>Jul-24</u> Col. B	<u>Aug-24</u> Col. C	<u>Total</u> Col. D
1				
	Balancing Demand Cost of Gas to be Recovered through GCA			
	\$49,830	\$49,173	\$51,348	\$150,351
2				
	Actual Balancing Demand Cost Billed Excluding Gross/Utility Receipts Tax			
	\$61,972	\$69,571	\$56,067	\$187,610
3				
	Dollar Amount of Balancing Demand Cost Variance From Cause No. 37399, GCA 162			
	(2,063)	(1,582)	(1,573)	(5,218)
4				
	Dollar Amount of Balancing Demand Cost Variance From Cause No. 37399, GCA 162			
	1,895	1,765	1,911	5,571
5				
	Balancing Demand Cost recovered to be Reconciled with actual Balancing Demand Cost Incurred			
	62,140	69,388	55,729	187,257
6				
	Gas Cost Variance			
	(\$12,310)	(\$20,215)	(\$4,381)	(\$36,906)
7				
	Variance Allocated to GCA 164			
				(\$21,010)
8				
	Variance Allocated to GCA 165			
				(9,613)
9				
	Variance Allocated to GCA 166			
				(701)
10				
	Variance Allocated to GCA 167			
				(5,582)
11				
	Total Variance Allocation			
				(\$36,906)

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EXHIBITS

PUBLIC'S EXHIBIT NO. 3
GCA 164 STATISTICAL CALCULATIONS

CAUSE NO. 37399 GCA 164
CITIZENS GAS

IURC
PUBLIC'S
EXHIBIT NO. 3
11-14-24
DATE REPORTER AT

ESTIMATION INFORMATION:

<u>December 2024</u>	Volumes in Dth	Commodity Cost per Dth	Percent of Total
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,241,700	\$2.9310	27.70%
Unnominated Seasonal Gas Purchases	900,000	\$2.7045	20.08%
Boil Off/Peaking Purchases	42,263	\$3.0670	0.94%
Storage Withdraw - (Net)	<u>2,299,119</u>	<u>\$2.5644</u>	<u>51.28%</u>
Total Purchases and Net Withdrawals	4,483,082	\$2.6988	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	<u>4,483,082</u>	<u>\$2.6988</u>	
 <u>January 2025</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,568,961	\$3.3385	28.26%
Unnominated Seasonal Gas Purchases	900,000	\$2.7045	16.22%
Boil Off/Peaking Purchases	42,263	\$3.3390	0.76%
Storage Withdraw - (Net)	<u>3,039,061</u>	<u>\$2.5910</u>	<u>54.76%</u>
Total Purchases and Net Withdrawals	5,550,285	\$2.8264	99.99%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	<u>5,550,285</u>	<u>\$2.8264</u>	
 <u>February 2025</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,426,745	\$3.2773	24.66%
Unnominated Seasonal Gas Purchases	900,000	\$2.7045	15.56%
Boil Off/Peaking Purchases	42,263	\$3.2110	0.73%
Storage Withdraw - (Net)	<u>3,415,646</u>	<u>\$2.5913</u>	<u>59.05%</u>
Total Purchases and Net Withdrawals	5,784,654	\$2.7826	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	<u>5,784,654</u>	<u>\$2.7826</u>	
 <u>Quarterly Total</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	4,237,406	\$3.1985	26.79%
Unnominated Seasonal Gas Purchases	2,700,000	\$2.7045	17.07%
Boil Off/Peaking Purchases	126,789	\$3.2057	0.80%
Storage Withdraw - (Net)	<u>8,753,826</u>	<u>\$2.5841</u>	<u>55.34%</u>
Total Purchases and Net Withdrawals	15,818,021	\$2.7742	100.0%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	<u>15,818,021</u>	<u>\$2.7742</u>	

BILL COMPARISONS
PROPOSED VS. CURRENTLY APPROVED GCA FACTORS

December 2024

Petitioner's Requested GCA Factor (\$/Dth) - December 2024	\$3.398
Current Commission Approved GCA Factor (GCA 163 - October 2024)	\$5.000
Increase (Decrease)	(\$1.602)

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	44.71	52.72	(\$8.01)	-15.19%
10	73.16	89.18	(\$16.02)	-17.96%
15	101.61	125.64	(\$24.03)	-19.13%
20	130.06	162.10	(\$32.04)	-19.77%
25	158.51	198.56	(\$40.05)	-20.17%

January 2025

Petitioner's Requested GCA Factor (\$/Dth) - January 2025	\$3.461
Current Commission Approved GCA Factor (GCA 163 - October 2024)	\$5.000
Increase (Decrease)	(\$1.539)

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	45.03	\$52.72	(\$7.69)	-14.59%
10	73.79	\$89.18	(\$15.39)	-17.26%
15	102.56	\$125.64	(\$23.08)	-18.37%
20	131.32	\$162.10	(\$30.78)	-18.99%
25	160.09	\$198.56	(\$38.47)	-19.37%

February 2025

Petitioner's Requested GCA Factor (\$/Dth) - February 2025	\$3.204
Current Commission Approved GCA Factor (GCA 163 - October 2024)	\$5.000
Increase (Decrease)	(\$1.796)

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	43.74	\$52.72	(\$8.98)	-17.03%
10	71.22	\$89.18	(\$17.96)	-20.14%
15	98.70	\$125.64	(\$26.94)	-21.44%
20	126.18	\$162.10	(\$35.92)	-22.16%
25	153.66	\$198.56	(\$44.90)	-22.61%

BILL COMPARISONS
PROPOSED VS. PRIOR YEAR APPROVED GCA FACTORS

December 2024

Petitioner's Requested GCA Factor (\$/Dth) - December 2024	\$3.398
Prior Year Commission Approved GCA Factor (GCA 160 - December 2023)	\$3.935
Increase (Decrease)	(\$0.537)

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$44.71	47.46	(\$2.75)	-5.79%
10	\$73.16	78.66	(\$5.50)	-6.99%
15	\$101.61	109.86	(\$8.25)	-7.51%
20	\$130.06	141.06	(\$11.00)	-7.80%
25	\$158.51	172.26	(\$13.75)	-7.98%

January 2025

Petitioner's Requested GCA Factor (\$/Dth) - January 2025	\$3.461
Prior Year Commission Approved GCA Factor (GCA 160 - January 2024)	\$3.669
Increase (Decrease)	(\$0.208)

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$45.03	46.14	(\$1.11)	-2.41%
10	\$73.79	76.01	(\$2.22)	-2.92%
15	\$102.56	105.89	(\$3.33)	-3.14%
20	\$131.32	135.76	(\$4.44)	-3.27%
25	\$160.09	165.64	(\$5.55)	-3.35%

February 2025

Petitioner's Requested GCA Factor (\$/Dth) - February 2025	\$3.204
Prior Year Commission Approved GCA Factor (GCA 160 - February 2024)	\$3.797
Increase (Decrease)	(\$0.593)

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$43.74	46.78	(\$3.04)	-6.50%
10	\$71.22	77.29	(\$6.07)	-7.85%
15	\$98.70	107.81	(\$9.11)	-8.45%
20	\$126.18	138.32	(\$12.14)	-8.78%
25	\$153.66	168.84	(\$15.18)	-8.99%

ANALYSIS OF PETITIONER'S SCHEDULE 6 VARIANCE CALCULATIONS

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	2,576,148	5,957,869	11,179,549	13,292,043
Variance	(2,605,168)	(3,824,137)	2,292,009	(147,215)	(409,497)	(784,320)	(1,184,319)	(1,355,951)	(106,807)	(1,047,712)	(915,640)	(2,649,030)
Monthly % Variance	-11.35%	-26.86%	12.60%	-2.16%	-11.48%	-40.33%	-52.43%	-72.90%	-4.15%	-17.59%	-8.19%	-19.93%
12 Mo. Avg.	7.38%	4.81%	5.88%	5.91%	4.58%	3.71%	2.87%	0.28%	-1.96%	-3.40%	-4.30%	-12.15%
GCA	162	162	163	163	163	164	164	164	165	165	165	166
Month	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
Actual Gas Cost	27,137,967	11,926,620	9,205,175	5,019,747	2,830,633	2,674,885	2,744,199	2,218,335				
Variance	4,631,012	(2,979,594)	1,196,281	593,207	963,836	68,449	(1,082,145)	166,114				
Monthly % Variance	17.06%	-24.98%	13.00%	11.82%	34.05%	2.56%	-39.43%	7.49%				
12 Mo. Avg.	-5.05%	-4.36%	-5.89%	-5.23%	-3.82%	-2.90%	-2.78%	-1.20%				

AFFIRMATION

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

LaCresha N. Vaulx

LaCresha N. Vaulx
Utility Analyst
Indiana Office of
Utility Consumer Counselor
Cause No. 37399 GCA 164
Citizens Gas

10/30/2024
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Indiana Office of Utility Consumer Counselor's Testimony of OUCC Witness LaCresha N. Vaulx has been served upon the following parties of record in the captioned proceeding by electronic service on October 30, 2024.

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