# FILED December 2, 2022 INDIANA UTILITY REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF WESTFIELD GAS, LLC, )	
D/B/A CITIZENS GAS OF WESTFIELD FOR (1)	
AUTHORITY TO INCREASE RATES AND )	
CHARGES FOR GAS UTILITY SERVICE AND )	
APPROVAL OF A NEW SCHEDULE OF RATES )	
AND CHARGES; (2) APPROVAL OF CERTAIN )	
REVISIONS TO ITS TERMS AND CONDITIONS )	
APPLICABLE TO GAS UTILITY SERVICE; AND )	<b>CAUSE NO. 45761</b>
(3) APPROVAL PURSUANT TO INDIANA CODE )	
SECTION 8-1-2.5-6 OF AN ALTERNATIVE )	
REGULATORY PLAN UNDER WHICH IT )	
WOULD CONTINUE ITS ENERGY EFFICIENCY )	
PROGRAM PORTFOLIO AND ENERGY )	
EFFICIENCY RIDER	

#### INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S

# PUBLIC'S EXHIBIT NO. 6: TESTIMONY OF OUCC WITNESS BRIEN R. KRIEGER

**December 2, 2022** 

Respectfully submitted,

Jeffrey M. Reed

Attorney No 11651-49

Deputy Consumer Counselor

# WESTFIELD GAS, LLC D/B/A CITIZENS GAS OF WESTFIELD CAUSE NO. 45761 TESTIMONY OF OUCC WITNESS BRIEN R. KRIEGER

#### I. <u>INTRODUCTION</u>

1	Q:	Please state your name and business address.
2	A:	My name is Brien R. Krieger, and my business address is 115 W. Washington Street,
3		Suite 1500 South, Indianapolis, Indiana 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 in the Natural Gas Division. For a summary of my educational and
7		professional experience please see Appendix BRK-1 attached to my testimony.
8	Q:	What is the purpose of your testimony?
9	A:	The purpose of my testimony is to discuss my review and analysis of Westfield Gas,
10		LLC's d/b/a Citizens Gas of Westfield, Inc. ("Petitioner" or "Westfield Gas") cost of
11		service study ("COSS"), proposed rate design, tariffs, and monthly customer charges.
12		My testimony specifically addresses the application of Petitioner's revenue
13		requirement to rate classes, and Petitioner's proposed monthly customer charges.
14 15	Q:	Please summarize your recommendations concerning Petitioner's COSS, rate design, monthly customer charges, and tariffs.
16	A:	I recommend the Indiana Utility Regulatory Commission ("Commission") not approve
17		Petitioner's proposed COSS, which includes Fair Value, but instead require Petitioner
18		to rerun the COSS using Original Cost Plant in Service and Original Cost Accumulated
19		Depreciation. The COSS should incorporate the Commission's final determination of
20		the Weighted Average Cost of Capital ("WACC") and Original Cost Rate Base along

1 with the Commission's final determination of the revenue requirement to determine 2 each rate class' revenue requirement. 3 I do not agree with Petitioner's proposed residential class monthly customer 4 charge increase from \$11.83 to \$16.76. I recommend the residential monthly customer 5 service charge be set to \$14.00. My final recommendation is for Petitioner to include a 6 detailed analysis to determine its Design Day Throughput allocator in its next COSS. 7 I do not have any recommended changes to Petitioner's updated tariff 8 language. Finally, Petitioner should provide the OUCC and Commission with a final 9 revenue proof and updated, red-lined tariff that includes all items from the 10 Commission's Final Order. 11 Q: Are you sponsoring any attachments in this proceeding? 12 A: Yes. I am sponsoring the OUCC's COSS results using the OUCC's recommended 13 changes for Original Cost Rate Base and WACC incorporated into Petitioner's COSS 14 model. The OUCC's results are in Attachment BRK-3 - OUCC COSS-1 (Using 15 Original Cost Rate Base with Petitioner's WACC for Original Cost Rate Base) and 16 Attachment BRK-4 - OUCC COSS-2 (Original Cost Rate Base with the OUCC's 17 Proposed WACC for Original Cost Rate Base). To the extent you do not address a specific item in your testimony, should it be 18 Q: 19 construed to mean you agree with Petitioner's proposal? 20 A: No. Not addressing a specific item or adjustment Westfield Gas proposes does not

indicate my agreement or approval. Rather, the scope of my testimony is limited to the

specific items addressed herein.

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#### II. OVERVIEW OF PETITIONER'S SYSTEM OPERATION AND COSS

Q: Please describe Westfield Gas' natural gas system.

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Petitioner serves Westfield, Indiana. Petitioner's service territory is centered on US 31 and Indiana SR 32. Petitioner's distribution mains extend west to Executive Airport, and just east of US 31. The northern boundary is approximately 193<sup>rd</sup> St. and the southern boundary is 156th St. In response to OUCC Data Request ("DR") 1.1, Petitioner provided a system map including city gates ("take-points"). The majority of Petitioner's distribution mains are plastic polyethylene mains. Distribution mains represent approximately 98% of the historical cost of the total transmission and distribution mains. (Petitioner's Exhibit No. 6, Attachment SAM-1, page 58, Summary of Reproduction Cost New Less Depreciation, Historical Cost Column (1).) On the system map, Petitioner indicated distribution mains are classified at 50 psi and the transmission mains at 748 psi. Petitioner's distribution system is compact, serving residential subdivisions except a single distribution main serving the Grand Park area to the North and a different distribution main serving the Executive Airport to the west at approximately Indiana SR 32 and US 421. The residential customer class dominates the number of customers served by Westfield Gas. The residential rate class is approximately 52% of annual throughput and the commercial rate class is approximately 37% of annual throughput.

#### Q: Did Petitioner perform a Cost-of-Service Study ("COSS") for this Cause?

20 A: Yes. Petitioner complied with the Commission's Order in Cause No. 44731 to prepare 21 a COSS in this rate case. *In re Westfield Gas*, Cause No. 44731, Final Order p. 23 (Ind.

1 Util. Regulatory Comm'n Apr. 26, 2017). Petitioner used Reproduction Costs and a 2 WACC of 8.426% in its COSS. 3 Q: Please describe Petitioner's customer base included in Petitioner's COSS. 4 A: Petitioner's system map indicates most distribution mains serve a small and contiguous 5 area centered around US 31 and Indiana SR 32. The three (3) take-points are all 6 centrally located and are connected to the distribution system with minimal 7 transmission mains. All distribution mains are the same pressure. My analysis indicates 8 the rate class usage allocators accurately represent Petitioner's customer base. I have 9 no issues with these rate class characteristic allocators, and these allocators and their 10 use with the COSS represent cost causation of Petitioner's system. I do not change any 11 of the customer characteristic allocators. Do you have any concerns about the Cost-of-Service ("COS") modeling of 12 Q: 13 Petitioner's Rate Base and the associated cost allocation? 14 Yes. I do not agree with Petitioner using Reproduction Cost ("Fair Value") in A: 15 Petitioner's COSS. There are three major Fair Value issues in Petitioner's COS model: 16 Petitioner's use of a calculated Fair Value of Gross Plant, calculated Accumulated 17 Depreciation using a Fair Value method, and Petitioner's proposed hybrid Weighted 18 Average Cost of Capital for Fair Value. 19

The OUCC recommends an Original Cost ("Historical Cost") Rate Base and weighted average cost of capital based upon Original Cost. Use of Fair Value increases revenue requirements and results in inflated rates while distorting the historical rate base and allocation of Rate Base. Fair Value inflates revenue requirements by increasing Rate Base value from Historical Value to Fair Value. (Petitioner's Exhibit

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1 No. 6, Attachment SAM-1 Accounting Report on Fair Value of Assets, August 26, 2 2022, page 58.) For those amounts used in the COSS, I calculated the Rate Base differential from Attachment SAM-1 to be \$6,808,549 to indicate the approximate 3 4 magnitude of Rate Base differentials (\$25,602,224 - \$18,793,675 = \$6,808,549). 5 (Petitioner's Exhibit No. 6, Attachment SAM-1 Accounting Report on Fair Value of 6 Assets, August 26, 2022, page 58.) 7 Petitioner's COS model is functional and contains all COSS calculations to 8 derive rate class revenue requirements for independent study. The OUCC reran 9 Petitioner's COS model to show the Commission the inflated revenue requirements if 10 Petitioner's proposed Fair Value Rate Base is used in the model. Please briefly describe the Fair Value issues, the OUCC's changes to Petitioner's 11 Q: COS model, and summarize your analysis. 12 13 A: My three issues, which I change in the OUCC's COS runs, are the following 14 Petitioner's COS inputs: 1) Fair Value of Petitioner's Gross Plant, 2) Accumulated 15 Depreciation at Fair Value, and 3) the proposed Weighted Average Cost of Capital for 16 Fair Value. 17 My first concern is determining the correct Rate Base to use in the COS model. Petitioner provides a summary comparison of Historical Cost and Original Cost. 18 19 (Petitioner's Exhibit No. 6, Attachment SAM-1, page 58, Summary of Reproduction 20 Cost New Less Depreciation, columns (1).) I use the Historical Cost ("Original Cost") 21 column (1) for an input to the OUCC COS modeling. OUCC witness Leja Courter testifies regarding the differences between Petitioner's Fair Value and Original Cost Rate Base. (Public's Exhibit No. 5, pages 27-35.)

My second concern is the Accumulated Depreciation, which is subtracted from Petitioner's Fair Value gross plant assets. Petitioner uses the estimated expired life of assets to determine the Fair Value Accumulated Depreciation. (Petitioner's Exhibit No. 6, Attachment SAM-1, pages 42-57, page 58, footnote 2.) I use Petitioner's Original Cost Accumulated Depreciation balances as of December 31, 2021 that Petitioner provided. (Attachment BRK-5, Petitioner's workpaper 470-S1, Column F.) The OUCC proposes to use the Original Cost Rate Base to calculate Petitioner's rates. Therefore, I have used the book depreciation to determine the net plant in service on December 31, 2021.

My third issue is the WACC, which is also affected by Fair Value. Petitioner uses a Fair Value WACC of 8.426%. The OUCC recommends a Fair Value WACC of 5.65%. The OUCC recommends an Original Cost WACC of 7.94%. (Public's Exhibit No. 5, Attachment LDC-2, page 1.) Petitioner also provided a WACC for the Original Cost Rate Base of 9.066%. (Petitioner's Exhibit No. 2, Attachment CLJ-1.) I use Petitioner's 9.066% original cost WACC in my COSS-1 along with Original Cost Rate Base. In OUCC COSS-2, I use the OUCC's recommended WACC for Original Cost Rate Base – 7.94%, along with the Original Cost Rate Base. (Public's Exhibit No. 5, Attachment LDC-13.)

I do not change Petitioner's proposed revenue and expenses in the COS model, but the OUCC does recommend increased revenue and reduced expenses. I do *not* have

any issues with Petitioner's COSS allocation process and the allocators *unrelated* to Fair Value. Section III provides more detail, COS comparisons, and results of my analysis.

#### III. COST OF SERVICE ANALYSIS

4 5	Q:	Have there been any material changes within Petitioner's customer classes that require a COSS?
6	A:	Yes. Petitioner's prior COSS was presented in Cause No. 38778-U with its test year
7		ending September 30, 1988. In 1988, Petitioner had 630 residential customers, 90
8		commercial customers, and a single industrial customer. Petitioner's across-the-board
9		cost allocation has been approved by the Commission in various rate cases since 1988,
10		including the previous general rate case. (Order April 26, 2017, Cause No. 44731.) In
11		Cause No. 44731, Petitioner had approximately 3,500 residential, 410 commercial, 9
12		industrial, and 1 large volume interruptible customer. Presently, Westfield Gas has
13		approximately 5,650 residential, 485 commercial, 9 industrial, and 1 large volume
14		interruptible customer. (Petitioner's Exhibit No. 6, SAM-2, Schedule 1.) Petitioner's
15		residential rate class has experienced the greatest customer count growth along with
16		associated infrastructure to serve the residential rate class.
17 18	Q:	Please describe the primary COSS allocation factors representing rate class consumption characteristics.
19	A:	Petitioner's dominant customer classes are small users with winter peaking. The
20		Residential (D20) rate class represents 92% of the customer count, 52% of the annual
21		throughput, and 59% of the winter peak Design Day. The Commercial (D40) rate class

is almost 8% of Petitioner's customers, 37% of annual throughput, and 34% of the winter peak Design Day.

The Large Volume Interruptible Service (D50) uses approximately 10% of the annual throughput and approximately 6% of the design day throughput but is only represented by one customer. The Industrial rate class (D30) represents the remainder of consumption and is less than 2% of each consumption characteristic category.

I agree with Petitioner's determination of these rate class characteristics and their use within the COSS for rate class allocation. The consumption allocators and plant design indicate Petitioner's choice for main allocation (42.5% on annual throughput and 42.5% on design day throughput, peak demand, with the remainder on number of customers) represents cost causation for the dominant rate classes, D20 and D40.

Petitioner's choice of direct allocation also follows good cost causation principles by assigning actual costs for meter, services, house regulators, and industrial measuring and regulating equipment to the rate class responsible for costs. As an example, Industrial Measuring and Regulating Equipment is 100% directly assigned to the Industrial Class, D30. I have no issues with the allocation within Petitioner's COSS. However, there are the "100 Series" of Internally Generated allocators that do change within Petitioner's COSS according to the Gross Plant and Depreciation Reserve used in the Model. The OUCC changes Gross Plant and Depreciation Reserve within the COSS to represent Original Cost, using data provided by Petitioner. Changing to an

original cost Rate Base results in some of the "100 Series" allocators changing, which changes the allocations to the classes of customers, as discussed below.

Q:

A:

#### Please describe Petitioner's use and calculation of the Design Day Throughput.

Petitioner uses allocator Design Day Throughput (4) to allocate 42.5% of distribution mains to all rate classes. Petitioner's entire COSS is on Petitioner's Exhibit No., 6, Attachment SAM-2, which includes the allocation of distribution mains and other plant on Schedule 2. My analysis indicates this is an acceptable allocation of distribution mains because natural gas mains need to be sized to carry enough natural gas to supply all customers during peak demands and these peak demands are typically a function of the coldest days of the year. The remaining distribution mains are allocated 42.5% on Annual Throughput (1) and 15% on Number of Bills (3). My experience indicates use of these allocators also follows cost causation principles because remaining main allocation is predominantly based on annual use of the mains.

Petitioner did not provide its calculation of Design Day Throughput in testimony, but the OUCC asked for the calculation in OUCC Data Request ("DR") No. 10.4. (Attachment BRK-2; Petitioner's Response to OUCC DR No. 10.4.) I reviewed Petitioner's method provided in response to OUCC DR No. 10.4 to calculate the Design Day Throughput for the COSS. Petitioner did not use any metered data for setting baselines or a heating degree day method ("HDD"). (Attachment BRK-1; Petitioner's Response to OUCC DR No. 14.2.)

Petitioner chose a peak demand, Design Day Throughput, per rate class, without providing an explanation of its derivation, and then calculated the Design Day

1 Throughput as shown in Attachment BRK-2. Petitioner's method adjusts the peak day 2 allocator by each rate class percentage of annual throughput. The final rate class Design 3 Day Throughput as a percentage of system peak is acceptable based upon my 4 knowledge of similar rate classes with COSSs. However, I do recommend a more 5 thorough method using available metered data and heating degree days to determine 6 Design Day Throughput in Petitioner's next COSS. 7 Q: Please briefly describe other primary allocation factors and the importance of 8 these 100 Series allocators. 9 A: The other primary allocators are Gross Plant (101), Distribution Mains Plant (104), 10 Meters, Meter Installation and House Regulators (106), and Subtotal Gross Plant (108). 11 These are affected within Petitioner's COSS by the OUCC's proper use of Original 12 Cost. There are other allocators based upon Gas Cost and Expenses, however, I did not 13 change or affect these in my analysis for Attachment BRK-3, COSS-1 or Attachment 14 BRK-4, COSS-2. 15 These allocators are important because Westfield's Gross Plant is dominated by 16 Distribution Mains (65%) and Meters, Meter Installation, House Regulators and 17 Services (26%). Additionally, these two portions of Gross Plant, Allocator (104) and 18 Allocator (106), are used for the Depreciation Reserve and various expense allocation, 19 so it is evident using Fair Value distorts and increases allocated costs throughout the 20 COS model. 21 Q: Please summarize the changes you make to Petitioner's COS model for OUCC 22 COSS-1 and COSS-2. 23 A: For COSS-1, I revise Petitioner's COSS model by changing to Petitioner's Original 24 Cost for Gross Plant in service, Accumulated Depreciation, and Weighted Average

Cost of Capital to derive the OUCC's recommended revenue requirements, without revenue and expense adjustments. In the OUCC's COS modeling, I do not change Petitioner's proposed revenue or expenses. However, the OUCC does recommend increased revenues and reduced expenses in other OUCC Exhibits and the final determination of Commission approved revenue and expenses should be allocated in an updated COSS.

For a simple comparison of reduced revenue requirements, Petitioner's data indicates Petitioner's Fair Value Rate Base is approximately \$7,000,000 greater than Historical Cost. Petitioner Fair Value proposal is approximately 36% more than Original Cost. ((\$25,602,224-\$18,793,675)/\$18,793,675.) (Petitioner's Exhibit No. 6, Attachment SAM-1, page 58.)

My first model run, OUCC COSS-1, uses Original Cost Rate Base and Petitioner's proposed WACC based upon Original Cost Rate Base. Petitioner's WACC based upon Original Cost is found in Petitioner's Exhibit No. 2, Attachment CLJ-1. My second COSS run, OUCC COSS-2, uses Petitioner's Original Cost Rate Base, like in COSS-1, but changes to the OUCC's recommended WACC for Original Cost. In the next section, I present the OUCC's COSS results for COSS-1 and COSS-2.

Q: What are the results for the revenue requirements and associated margin increase for Petitioner's proposed COSS, OUCC COSS-1, and OUCC COSS-2?
 A: Petitioner's COSS is contained in Petitioner's Exhibit No. 6, Attachment SAM-2. This same model, with the OUCC's previously discussed changes, are in Attachment BRK-3, OUCC COSS-1 and Attachment BRK-4, OUCC COSS-2. For comparison, I present the following tables that are part of the COSS output contained on the Excel

spreadsheets as Tab Rev Comp, Schedule 10 <u>Comparison of Gas Sales Revenues at</u>

Present and Proposed Rates.

The results indicate the OUCC's proposal to use Original Cost Rate Base reduces the costs to the Residential (D20) rate class by \$403,092 as found by comparing the Margin at Proposed Rates in Table 1 to Table 2. (\$3,123,136 - \$2,720,044 = \$403,092.) The Residential (D20) margin increase percentage is reduced from 41.65% to 23.37%. This reduction is the result of changing data from Petitioner's Fair Value WACC and Rate Base to Original Cost WACC and Rate Base. These were the only two components that changed. My comparison, with Petitioner's data, indicates Fair Value WACC and Rate Base inflates the residential revenue requirement by \$403,092.

Table 1 Petitioner's Proposal: WACC 8.426% and Fair Value

	Pr	esent Revenue Lev	vels .	Pro	posed Revenue La	Increase or (Decrease)			
	Margins		Revenues	Margins		Revenues			
	at Present	Gas Cost	at Present	at Proposed	Gas Cost	at Proposed			
Rate Schedule	Rates	Revenue	Rates	Rates	Revenue	Rates	Amount	Rev. %	Margin %
Residential	\$2,204,835	\$2,697,629	\$4,902,464	\$3,123,136	\$2,697,629	\$5,820,765	\$918,301	18.73%	41.65%
Industrial	34,812	56,511	91,323	48,528	56,511	105,039	13,716	15.02%	39.40%
Commercial	838,355	1,069,776	1,908,131	1,161,955	1,069,776	2,231,731	323,600	16.96%	38.60%
Large Volume Interruptible Service	153,061	-	153,061	193,305	-	193,305	40,244	26.29%	26.29%
Total	\$3,231,063	\$3,823,916	\$7,054,979	\$4,526,924	\$3,823,916	\$8,350,840	\$1,295,861	18.37%	40.11%

Table 2 Petitioner's Data: WACC of 9.066% and Original Cost

	Pre	Present Revenue Levels			posed Revenue Le	Increase or (Decrease)			
	Margins		Revenues	Margins		Revenues			
	at Present	Gas Cost	at Present	at Proposed	Gas Cost	at Proposed			
Rate Schedule	Rates	Revenue	Rates	Rates	Revenue	Rates	Amount	Rev. %	Margin %
Residential	\$2,204,835	\$2,697,629	\$4,902,464	\$2,720,044	\$2,697,629	\$5,417,673	\$515,209	10.51%	23.37%
Industrial	34,812	56,511	91,323	40,543	56,511	97,054	5,731	6.28%	16.46%
Commercial	838,355	1,069,776	1,908,131	1,007,124	1,069,776	2,076,900	168,769	8.84%	20.13%
Large Volume Interruptible Service	153,061	-	153,061	165,023	-	165,023	11,962	7.82%	7.82%
Total	\$3,231,063	\$3,823,916	\$7,054,979	\$3,932,734	\$3,823,916	\$7,756,650	\$701,671	9.95%	21.72%

Table 3 OUCC Proposal: WACC of 7.94% and Original Cost

	Present Revenue Levels			Prop	osed Revenue Le	Increase or (Decrease)			
	Margins		Revenues	Margins		Revenues			
	at Present	Gas Cost	at Present	at Proposed	Gas Cost	at Proposed			
Rate Schedule	Rates	Revenue	Rates	Rates	Revenue	Rates	Amount	Rev. %	Margin %
Residential	\$2,204,835	\$2,697,629	\$4,902,464	\$2,616,843	\$2,697,629	\$5,314,472	\$412,008	8.40%	18.69%
Industrial	34,812	56,511	91,323	38,894	56,511	95,405	4,082	4.47%	11.73%
Commercial	838,355	1,069,776	1,908,131	963,591	1,069,776	2,033,367	125,236	6.56%	14.94%
Large Volume Interruptible Service	153,061	-	153,061	156,204	-	156,204	3,143	2.05%	2.05%
Total	\$3,231,063	\$3,823,916	\$7,054,979	\$3,775,532	\$3,823,916	\$7,599,448	\$544,469	7.72%	16.85%

- Table 3 indicates reducing the WACC from Petitioner's Original Cost WACC
- 2 (9.066%) to the OUCC's recommended Original Cost WACC (7.94%), without any
- 3 other revenue requirement variables, decreases the revenue requirement to residential
- 4 customers an additional \$100,000.

# IV. RATE DESIGN: SUBSIDIES, REVENUE SHIFTING, MONTHLY CUSTOMER CHARGES, AND TARIFF CHANGES

#### A. Subsidies

1 2	Q:	Does Petitioner propose to mitigate subsidies for all rate classes through its proposed rate design?
3	A:	Yes. Petitioner mitigates subsidies to all rate classes. The subsidy received by the
4		Residential rate class is reduced 25% and subsidies paid by all remaining rate classes
5		are reduced approximately 25%. (Petitioner's Exhibit No. 6, Attachment SAM-2,
6		Schedule 9, page 1.) Rates D30 and D40 each continue to pay approximately 5% of
7		their revenue requirements as subsidy to the Residential rate class, D20. The Large
8		Volume Interruptible Service (D50) pays less than 1% of its revenue requirement to the
9		Residential rate class.
10	Q:	What changes do you recommend to Petitioner's subsidy proposal?
11	A:	I have no changes to Petitioner's proposed subsidy for the rate classes. Petitioner's
12		proposed subsidies are gradual and move rate classes closer to the COSS results.
13 14	Q:	Are there any other subsidies embedded in the proposed class revenue requirement?
15	A:	Yes. There is an LVI discount all rate classes contribute to the Large Volume
16		Interruptible Service rate class. This LVI discount is separate from embedded rate
17		design subsidies and remains in place from the Commission's Order in Cause No.
18		43592. Westfield Gas intends to continue the existing discounted rate for Large Volume
19		Interruptible Service customers previously approved by the Commission. (Petitioner's
20		Exhibit No. 6, page 19, lines 11-12.) I do not oppose Petitioner's position concerning
21		the LVI subsidy.

### **B.** Monthly Customer Charges

### 1. Rate D20 – Residential

1 2	Q:	What monthly customer charge does Petitioner propose for Rate 20 – Residential Service?
3	A:	Petitioner proposes to increase the residential customer charge from \$11.83 to \$16.76.
4 5	Q:	How does Petitioner's proposed residential monthly customer charge compare to Petitioner's proposed margin increase?
6	A:	The percentage increases are approximately equal. The proposed Residential (D20)
7		monthly customer charge increase equals Petitioner's proposed Residential (D20)
8		margin increase and is approximately equal to the total margin increase for all rate
9		classes, 40.11%. The proposed monthly customer charge of \$16.76 represents
10		approximately 36.4% of the total margin revenue requirement for Rate D20, calculated
11		as the customer charge margin at proposed rates of \$1,137,099 divided by the total
12		margins at proposed rates of \$3,123,189. (Petitioner's Exhibit No. 6, Attachment SAM-
13		2, Schedule 11, Comparison of Margins at Present and Proposed Rates.)
14 15	Q:	Does Petitioner provide reasons for the customer charge increase equal to the margin increase?
16	A:	No. Petitioner does not provide FERC account analysis to attribute specific FERC costs
17		to a proposed monthly customer charge. Petitioner says:
18 19 20 21 22		The COSS resulted in an increase in monthly fixed customer charges for each customer class. These increases were simply the outcome of the COSS study and were arrived at by applying the same overall margin increase to the existing rates for each class without making any changes to the rate structure.
23		(Petitioner's Exhibit No. 7, page 17, line 20 to page 18, line 2.)

In this method, Petitioner presumes the customer charge increase should equal the volumetric rate block increase. As discussed below, the monthly customer charges would then represent a cost greater than the cost of being connected and would include portions of Petitioner's distribution system, operation of the system, and Petitioner's expenses.

Q:

A:

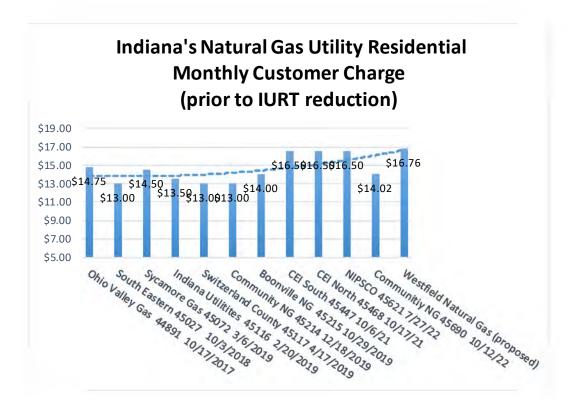
Please provide a brief explanation on why the percentage margin increase should not be equally applied to both the monthly customer charge and the rate blocks. Petitioner's requested margin increase uses the Fair Value of plant for some components (mains, meters, services, and regulators) to calculate its Monthly Customer Charge. The OUCC does not agree with Petitioner's Fair Value proposal and therefore the Fair Value margin percentage increase should not be applied to the existing monthly customer charge.

Additionally, setting the monthly customer charge percent increase equal to the total margin percent increase is a direct pass-through regardless of reliability or usage. Monthly charges should only represent costs of the connected service and some operations and maintenance expenses related to meter reading, meter replacements, services and service maintenance, billing, and revenue taxes.

Other margin costs are not dependent upon a connected service, and include various expenses, and do not represent the cost of each connected meter. One example is the distribution main. Petitioner can add more customers, and thus collect more monthly customer charges, for this asset by using excess and available capacity within pipelines. Additionally, Petitioner may be able to increase pressure to get more flow within a pipeline. Other costs are cyclical and dependent on Petitioner choices. Some

1 examples of variable or cyclical cost include Petitioner's controlled expenses, such as 2 staffing levels, administrative and general salary increases, employee pensions and 3 benefits, outside construction services, and some office supplies. 4 Q: Please provide a brief explanation on how the proposed monthly customer charge 5 affects customers during low monthly consumption. 6 A: Petitioner's proposed monthly customer charge for any residential customer using 30 7 therms per month or less is approximately 50% of the customer's margin cost and 36% 8 of the customer's total bill including the GCA. (Petitioner's Exhibit No. 6, Attachment 9 SAM-2, Schedule 13, page 1 of 4, Typical Bill Comparison Residential – D20.) My 10 analysis indicates the residential customers would lose the ability to control some costs 11 based upon their usage, while Petitioner's risk of not meeting the Rate D20 revenue 12 requirement would be substantially reduced with a higher customer charge and a lower 13 volumetric rate. 14 Q: How does Petitioner's proposed residential monthly customer charge compare to 15 other Indiana natural gas utilities? Petitioner's current residential monthly customer charge is \$11.83. (Petitioner's 16 A: 17 Exhibit No. 6, page 22, line 7.) The proposed residential monthly charge of \$16.76 18 would be the highest of Indiana natural gas utilities, as I have illustrated in Chart A. 19 (Please note monthly service charges presented in Chart A are those approved by the 20 Commission before reduction for the Utility Receipts Tax ("URT") repeal in HEA 1002 21 on July 1, 2022.)

Chart A – Indiana Natural Gas Utility Residential Customer Charges



#### What monthly residential customer charge is appropriate in this Cause?

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Q:

A:

I recommend Westfield Gas' monthly residential customer charge (Rate D20) be set at \$14.00, which more closely aligns with the average of Commission-approved residential customer charges for other small Indiana natural gas utilities before URT reductions. Also, an increase from \$11.83 to \$14.00 represents a portion of the percent margin increase (18.3%), but not the entirety of the proposed residential margin increase (41.7%). Additionally, my recommendation helps address the affordability issue of natural gas by placing more costs controlled by customer consumption into the volumetric rate portion of the block rate design.

# 2. Remaining Rates: Rates D30 Industrial, D40 Commercial, and D50 Large Volume Interruptible

- 1 Q: What Monthly Service Charge do you recommend for the remaining rates?
- 2 A: I do not oppose Petitioner's proposed increases to the remaining rate classes: D30
- 3 Industrial, D40 Commercial, and D50 Large Volume Interruptible. These proposed
- 4 Monthly Service Charges increases are all less than the proposed total margin increase.
- 5 40.11%.

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#### C. Rate Design and Tariff Changes

Q: Does Petitioner have any Rate Changes or Tariff language changes other than the monthly customer charges you do not agree with?

A: No. I reviewed Petitioner's testimony and attached redline tariff contained in Petitioner's Exhibit No. 7, Direct Testimony of Debi Bardhan-Akala, and have no objections to Petitioner's proposed tariff language changes. My analysis indicates Petitioner is more closely defining nominated consumption to enable the Economic Operational Flow Order to "warn" transportation customers of the potential for higher daily commodity gas prices to prepare/avoid curtailment if such circumstances required curtailment. (Petitioner's Exhibit No.7, page 24, lines 9 – 12.) Other transportation tariff changes include modifying some transportation enrollment criteria to be more accommodating to customers. (Petitioner's Exhibit No. 7, page 23, lines 12 – 15.) Petitioner does not propose any changes to Appendix C Non-Recurring Charges, which includes charges for bad checks, delinquent account trip charges, and reconnect charges. I have no recommended changes to the rate block structure or the tariff language.

Petitioner proposes the following other changes the OUCC does not oppose:

- Updated Table of Contents.
- Updated language in Rules 14.1 and 14.2.
- Updated language in 14.4: Non-Economic Operational Flow Order.
- Updated language in Appendix B and Appendix D.
- Updated and Clarifying language in Gas Rate Nos. A1, A3, A4, and S2.
- 6 Q: Please explain the OUCC's understanding of how Petitioner will apply the 7 approved revenue requirement in the Commission's Final Order to the volumetric 8 portion within rate design.
- Petitioner applied approximately equal percentage revenue increases to the volumetric portion of rates through each rate block of each rate class. (Petitioner's Exhibit No. 6, Attachment SAM-2, Schedule 11.) The slight variation of percentage increase to the volumetric rate blocks is necessary to accommodate the customer service charge revenue contribution. I have no issues with Petitioner's volumetric rate design when applying the Commission approved revenue requirements.

#### V. RECOMMENDATIONS

#### 15 Q: What are your recommendations?

16 A: I recommend the Commission require Petitioner to rerun the COSS model using
17 Original Cost data for Gross Plant and Depreciation Reserve. Additionally, the COSS
18 should include Commission approved revenue, expenses, and the Weighted Cost of
19 Capital for Original Cost. Incorporating these parameters will reduce the total revenue
20 requirement but will also change the allocation per rate class. Additionally, the
21 Commission should not accept Petitioner's proposed Residential (D20) monthly

customer charge but instead set the residential monthly customer charge to \$14.00. I have no issues with the other rate classes customer charge increases being equal to rate class margin increase based upon the Commission's final Order.

Petitioner should rerun the COS model and provide the OUCC and the Commission with the revenue proof and updated, red-lined tariff sheets using the Commission's Final Order. The OUCC agrees with Petitioner's proposed rate design, which assigns COSS margin increases equally throughout each individual rate class volumetric rate block. I recommend Commission approval of Petitioner's tariff changes. Finally, I recommend Petitioner provide detailed analysis and incorporate actual metered data in its Design Day Throughput calculation in its next base rate case. This calculation should be used to assess whether a new COSS will be necessary in a future rate case.

Q: Does this conclude your testimony?

14 A: Yes.

# APPENDIX BRK-1 TO THE TESTIMONY OF OUCC WITNESS BRIEN R. KRIEGER

#### I. PROFESSIONAL EXPERIENCE

1 Q: Please describe your educational background and experience.

A: I graduated from Purdue University in West Lafayette, Indiana with a Bachelor of Science

Degree in Mechanical Engineering in May 1986, and a Master of Science Degree in

Mechanical Engineering in August 2001 from Purdue University at the IUPUI campus.

From 1986 through mid-1997, I worked for PSI Energy and Cinergy progressing to a Senior Engineer. After the initial four years as a field engineer and industrial representative in Terre Haute, Indiana, I accepted a transfer to corporate offices in Plainfield, Indiana where my focus changed to industrial energy efficiency implementation and power quality. Early Demand Side Management ("DSM") projects included ice storage for Indiana State University, Time of Use rates for industrials, and DSM Verification and Validation reporting to the IURC. I was an Electric Power Research Institute committee member on forums concerning electric vehicle batteries/charging, municipal water/wastewater, and adjustable speed drives. I left Cinergy and worked approximately two years for the energy consultant, ESG, and then worked for the OUCC from mid-1999 to mid-2001.

I completed my Master's in Engineering in 2001, with a focus on power generation, including aerospace turbines, and left the OUCC to gain experience and practice in turbines. I was employed by Rolls-Royce (2001-2008) in Indianapolis working in an engineering capacity for military engines. This work included: fuel-flight regime

performance, component failure mode analysis, and military program control account management.

From 2008 to 2016 my employment included substitute teaching in the Plainfield, Indiana school district, grades 3 through 12. I passed the math Praxis exam requirement for teaching secondary school. During this period, I also performed contract engineering work for Duke Energy and Air Analysis. I started working again with the OUCC in 2016.

Over my career I have attended various continuing education workshops at the University of Wisconsin and written technical papers. While previously employed at the OUCC, I completed Week 1 of NARUC's Utility Rate School hosted by the Institute of Public Utilities at Michigan State University. In 2016, I attended two cost-of-service/rate-making courses: Ratemaking Workshop (ISBA Utility Law Section) and Financial Management: Cost of Service Ratemaking (AWWA).

In 2017, I attended the AGA Rate School sponsored by the Center for Business and Regulation in the College of Business & Management at the University of Illinois Springfield and attended Camp NARUC Week 2, Intermediate Course held at Michigan State University. I completed the Fundamentals of Gas Distribution on-line course developed and administered by Gas Technology Institute in 2018. In October 2019, I attended Camp NARUC Week 3, Advanced Regulatory Studies Program held at Michigan State University by the Institute of Public Utilities.

My current responsibilities include reviewing and analyzing Cost of Service Studies ("COSS") relating to cases filed with the Commission by natural gas, electric and water utilities. Additionally, I have taken on engineering responsibilities within the

OUCC's Natural Gas Division, including participation in "Call Before You Dig-811"
incident review, commenting on proposed IAC rules for natural gas gathering lines and
UPPAC/811 issues, along with attending natural gas emergency response training. I
regularly attend UPPAC "811" monthly penalty assignment advisory meetings.

#### Have you previously filed testimony with the Commission?

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A:

Yes. I have provided written testimony concerning COSS in more than thirteen base rate cases filed with the Indiana Utility Regulatory Commission. Additionally, I have provided written testimony for Targeted Economic Development ("TED") projects in 2017/2018/2020 and various Federal Mandate Cost Adjustment ("FMCA") and Transmission, Distribution, and Storage System Improvement Charges ("TDSIC") petitions. I filed testimony or provided analysis in over thirteen FMCA or TDSIC 7-Year Plan or Tracker petitions in Indiana.

While previously employed by the OUCC, I wrote testimony concerning the Commission's investigation into merchant power plants, power quality, Midwest Independent System Operator and other procedures. Additionally, I prepared testimony and position papers supporting the OUCC's position on various electric and water rate cases during those same years.

#### II. BACKGROUND OF TESTIMONY ANALYSIS

- 18 Q: Please describe the review you conducted to prepare this testimony.
- I reviewed Westfield Gas' Petition, Testimony, and Attachments for this Cause. I also reviewed Petitioner's prior base rate case, Cause No. 44731. I participated in OUCC case team meetings concerning Petitioner's case. I reviewed Petitioner's direct testimony of J.

P. Ghio, Adrien M. McKenzie, Sabine E. Karner, Scott A. Miller, and Debi Bardhan-Akala. 1 2 I reviewed Petitioner's responses to OUCC DRs. 3 Q: Have you reviewed Westfield Gas' COSS? 4 A: Yes. I reviewed Westfield Gas' COSS model and results presented in Petitioner's Exhibit 5 No. 6, Attachment SAM-2, Accounting Report on Cost of Service Study. I asked questions 6 of Petitioner to better understand Petitioner's theory, data derivations, and process for 7 developing the COSS model. I participated in informal discussions with Petitioner on 8 August 9, 2022. My analysis focused on testimony provided by Petitioner's COSS witness 9 Scott A. Miller, Petitioner's Exhibit No. 6, Attachment SAM-2, and Petitioner's responses

to OUCC DRs.

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Cause No. 45761 Page 1 of 1

Responses of Westfield Gas LLC Office of Utility Consumer Counselor's Fourteenth Set of Data Requests

#### DATA REQUEST NO. 2:

OUCC DR10.6 asked if any Westfield Gas metered peak daily consumption was used to determine Allocator (4) Design Day Throughput and Petitioner answered: "No."

- a. Please explain whether any of Petitioner's meters have the capabilities to measure daily consumption.
- b. If the answer to subpart a. is affirmative, please provide the names of the rate classes that have these metering capabilities, the number of meters in each rate class that can measure daily consumption, and explain why metered data was not used for Design Day Throughput Allocator (4).

#### **RESPONSE:**

- a. Petitioner has eleven meters in its system with the capability to provide daily consumption. These meters are Automated Meter Reading ("AMR") meters.
- b. Petitioner's AMR meters are installed among the following rate classes as shown below:
  - a. Commercial Delivery Service seven meters
  - b. Industrial Delivery Service two meters
  - c. Large Volume Interruptible Delivery Service two meters

There was insufficient AMR daily meter data to determine a system Design Day Throughput Allocator.

#### WITNESS:

Scott A. Miller

Attachment BRK-2
Cause No. 45761
Cause No. 45761
Page 1 of 2
Responses of Westfield Gas, LLC
Office of Utility Consumer Counselor's
Tenth Set of Data Requests

#### **DATA REQUEST NO. 4:**

Please explain how COSS Allocator (4) – Design Day Throughput was derived and calculated which is located on Petitioner's Attachment SAM-2, Schedule 1, Page 1 of 1.

#### **RESPONSE:**

See attached workpaper identified as OUCC DR 10.4 for the calculation of design day throughput. Projected peak day demand for retail and transportation customers was provided by Petitioner's management. The retail peak day demand was allocated to the customer classes pro rata based on pro forma annual sales (retail). Transportation peak day demand was allocated pro rata by pro forma transportation therms. The sum of these two allocations for each customer class is the calculated design day throughput.

#### **WITNESS:**

Scott A. Miller

#### **CALCULATION OF DESIGN DAY THROUGHPUT**

Cause No 45761 OUCC DR 10.4 Page 1 of 1

	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50	Total	1 age 1 61 1
Pro Forma Annual Throughput (Therms)	4,149,092 52.3998%	93,991 1.1870%	2,890,777 36.5082%	784,297 9.9050%	7,918,157 100.0000%	-
Pro Forma Annual Sales (Retail Therms)	4,149,092 70.3369%	81,119 1.3752%	1,668,673 28.2879%	- 0.0000%	5,898,884 100.0000%	-
Pro Forma Transportation Therms	0 0.0000%	12,872 0.6375%	1,222,104 60.5219%	784,297 38.8406%	2,019,273 100.0000%	-
Projected Peak Day Demand - Retail (dth) Times percentage Retail Therms	8,405 70.3369%	8,405 1.3752%	8,405 28.2879%	8,405 0.0000%		
Retail portion of Design Day throughput	5,911.82	115.59	2,377.60		8,405.01	-
Projected Peak Day Demand - Transportation (dth) Times percentage Transportation Therms	1,605 0.0000%	1,605 0.6375%	1,605 60.5219%	1,605 38.8406%		
Transportation portion of Design Day throughput		10.23	971.38	623.39	1,605.00	-
Design Day Throughput	5,911.82	125.82	3,348.97	623.39	10,010.00	-
Design Day Throughput Percentages	59.0592%	1.2569%	33.4562%	6.2277%	100.0000%	-

#### **SCHEDULE OF ALLOCATION FACTORS**

Attachment BRK-3 Schedule 1 Page 1 of 1

Allocator Name	Allocator No.	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50	Total
Input Allocators						
Pro Forma Annual Throughput	(1)	4,149,092	93,991	2,890,777	784,297	7,918,157
	(1)	52.3998%	1.1870%	36.5082%	9.9050%	100.0000%
Pro Forma Annual Sales	(2) (2)	4,149,092 70.3369%	81,119 1.3752%	1,668,673 28.2879%	0.0000%	5,898,884 100.0000%
Pro Forma Number of Bills	(3)	67,846	107	5,815	24	73,792
	(3)	91.9422%	0.1450%	7.8803%	0.0325%	100.0000%
Design Day Throughput	(4)	5,911.82	125.82	3,348.97	623.39	10,010.00
	(4)	59.0592%	1.2569%	33.4562%	6.2277%	100.0000%
Meters Weighting Factor Pro Forma Meters	(7) (7) (7)	1.0 67,846 71.9048%	15.4 1,648 1.7464%	4.1 23,842 25.2678%	42.5 1,020 1.0810%	94,355 100.0000%
Services Weighting Factor Pro Forma Services	(8) (8) (8)	1.0 67,846 84.9174%	6.0 642 0.8035%	1.9 11,049 13.8285%	15.0 360 0.4506%	79,897 100.0000%
95% Rate RS / 5% Rate CS	(9) (9)	95.0000%	0.0000%	5.0000%	0.0000%	100.0000%
100% Industrial	(10) (10)	0.0000%	100.0000%	0.0000%	0.0000%	100.0000%
Pro Forma Transportation Bills	(11)	0	24	538	24	586
	(11)	0.0000%	4.0956%	91.8089%	4.0955%	100.0000%
Internally-Generated Allocators						
Gross Plant	(101)	\$13,445,959	\$245,387	\$5,465,897	\$1,069,748	\$20,226,991
	(101)	66.4752%	1.2132%	27.0228%	5.2887%	99.9999%
Distribution Mains Plant	(104)	\$7,530,186	\$130,558	\$3,806,488	\$844,759	12,311,991
	(104)	61.1614%	1.0604%	30.9169%	6.8613%	100.0000%
Mains and Services Plant	(105)	\$11,165,502	\$164,956	\$4,398,486	\$864,049	16,592,993
	(105)	67.2905%	0.9941%	26.5081%	5.2073%	100.0000%
Meters, Meter Installations and House Regulators	(106)	\$642,864	\$15,613	\$225,907	\$9,665	894,049
	(106)	71.9048%	1.7463%	25.2679%	1.0810%	100.0000%
Subtotal Gross Plant	(108)	\$12,493,160	\$227,998	\$5,078,575	\$993,944	18,793,677
	(108)	66.4752%	1.2132%	27.0228%	5.2887%	99.9999%
O&M Without Gas Costs	(109)	\$577,013	\$5,098	\$144,465	\$23,146	\$749,722
	(109)	76.9636%	0.6800%	19.2691%	3.0873%	100.0000%
Distribution O&M	(110)	\$276,764	\$4,077	\$106,748	\$20,454	\$408,043
	(110)	67.8272%	0.9992%	26.1610%	5.0127%	100.0001%
Gas Costs	(111)	\$2,697,629	\$56,511	\$1,069,776	\$0	\$3,823,916
	(111)	70.5463%	1.4778%	27.9759%	0.0000%	100.0000%

#### **ALLOCATION OF FAIR VALUE RATE BASE**

Attachment BRK-3 SCHEDULE 2 PAGE 1 OF 1

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
GROSS PLANT	7 tilocator 140.	Motriod	1000				
Distribution:							
Mains:							
Customer	(3)	Number of Bills	\$ 1,846,799	\$1,697,987	\$2,678	\$145,533	\$600
Commodity	(1)	Annual Throughput	\$ 5,232,596	\$2,741,870	62,111	1,910,327	518,289
Demand	(4)	Design Day Throughput	\$ 5,232,596	3,090,329	65,769	1,750,628	325,870
Land and Land Rights	(104)	Distributions Mains Plant	\$46,086	28,187	489	14,248	3,162
Structures and Improvements	(104)	Distributions Mains Plant	39,942	24,429	424	12,349	2.741
Measuring and Regulating Equipment	(104)	Distributions Mains Plant	110,036	67,300	1,167	34,020	7,550
Industrial Measuring and Regulating Equipment	(10)	100% industrial	32,553	-	32,553		-
Services	(8)	Direct	4,281,001	3,635,316	34,398	591,998	19,290
Meters	(7)	Direct	791,240	568,940	13,818	199,929	8,553
Meter Installations	(7)	Direct	16,147	11,609	282	4,080	175
House Regulators	(7)	Direct	86,663	62,315	1,513	21,898	937
Transmission:	(.,)	2301	30,000	02,0.0	1,010	2.,000	00.
Structures and Improvements	(1)	Annual Throughput	83,079	43,533	986	30,331	8,229
Mains	(1)	Annual Throughput	277,307	145,308	3,292	101,240	27,467
Measuring and Regulating Equipment	(1)	Annual Throughput	717,630	376,037	8,518	261,994	71,081
General and Intangible Plant	(108)	Subtotal Gross Plant	1,433,315	952,799	17,389	387,322	75,804
Ocheral and intelligible Flant	(100)	Subtotal Gross Flam	1,400,010	302,133	17,000	001,022	70,004
Total Gross Plant			\$20,226,990	\$13,445,959	\$245,387	\$5,465,897	\$1,069,748
DEPRECIATION RESERVE (Accumulated Deprecia	ation MSFR1, page	203)					
Distribution:		<u>-</u> _					
Mains	(104)	Distributions Mains Plant	(3,724,346)	(\$2,277,862)	(\$39,493)	(\$1,151,452)	(\$255,539)
Structures and Improvements	(104)	Distributions Mains Plant	(3,852)	(2,356)	(41)	(1,191)	(264)
Measuring and Regulating Equipment	(104)	Distributions Mains Plant	(36,694)	(22,443)	(389)	(11,345)	(2,518)
Industrial Measuring and Regulating Equipment	(10)	100% industrial	(33,356)	-	(33,356)	-	-
Services	(8)	Direct	(1,687,229)	(1,432,751)	(13,557)	(233,318)	(7,603)
Meters	(7)	Direct	(416,155)	(299,236)	(7,268)	(105,153)	(4,499)
Meter Installations	(7)	Direct	(14,069)	(10,116)	(246)	(3,555)	(152)
House Regulators	(7)	Direct	(65,413)	(47,035)	(1,142)	(16,528)	(707)
Transmission:	( )		(3.2)	( ,,	( , , ,	( -,,	( - )
Structures and Improvements	(1)	Annual Throughput	(129)	(68)	(2)	(47)	(13)
Mains	(1)	Annual Throughput	(1,470)	(770)	(17)	(537)	(146)
Measuring and Regulating Equipment	(1)	Annual Throughput	(1,531)	(802)	(18)	(559)	(152)
General and Intangible Plant	(108)	Subtotal Gross Plant	(682,827)	(453,911)	(8,284)	(184,519)	(36,113)
Total Depreciation Reserve			(\$6,667,071)	(\$4,547,350)	(\$103,813)	(\$1,708,204)	(\$307,706)
·							
OTHER BASE RATE COMPONENTS							
Materials and Supplies	(101)	Gross Plant	\$401,124	266,648	4,866	108,395	21,214
Total Other Base Rate Components			\$401,124	\$266,648	\$4,866	\$108,395	\$21,214
Total HISTORICAL Value Rate Base			\$13,961,043	\$9,165,257	\$146,440_	\$3,866,088	\$783,256

#### **ALLOCATION OF DEPREPCIATION AND AMORTIZATION EXPENSES**

Attachment BRK-3 SCHEDULE 3 PAGE 1 OF 1

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
<u>Distribution:</u>	(40.4)	Birding Mark Blood	0044.045	<b>04.47.500</b>	<b>#0.550</b>	Ф <b>7.</b> 4.00 <b>7</b>	040.557
Mains	(104)	Distribution Mains Plant	\$241,315	\$147,592	\$2,559	\$74,607	\$16,557
Structures and Improvements	(104)	Distribution Mains Plant	935	572	10	289	64
Measuring and Regulating Equipment	(104)	Distribution Mains Plant	3,395	2,076	36	1,050	233
Industrial Measuring and Regulating Equipment	(10)	100% industrial	339	0	339	0	0
Services	(8)	Direct	118,584	100,699	953	16,398	534
Meters	(7)	Direct	21,363	15,361	373	5,398	231
Meter Installations	(7)	Direct	281	202	5	71	3
House Regulators	(7)	Direct	1,855	1,334	32	469	20
<u>Transmission:</u>							
Structures and Improvements	(1)	Annual Throughput	1,554	815	18	567	154
Mains	(1)	Annual Throughput	5,879	3,081	70	2,146	582
Measuring and Regulating Equipment	(1)	Annual Throughput	18,371	9,626	218	6,707	1,820
General and Intangible Plant	(108)	Subtotal Gross Plant	92,771	61,669	1,125	25,069	4,906
Total Depreciation and Amortization Expenses			\$506,642	\$343,027	\$5,738	\$132,771	\$25,104

# ALLOCATION OF PRO FORMA OPERATION AND MAINTENANCE EXPENSES AT PRESENT REVENUE LEVELS

Attachment BRK-3 SCHEDULE 4 PAGE 1 OF 2

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50	
PRO FORMA COST OF GAS Commodity Cost of Purchased Gas			\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -	
OPERATING EXPENSES								
Transmission:								
Operation Supervision and engineering	(2)	Annual Sales	8,109	5,703	112	2,294	-	
Distribution:								
Mains and Services	(105)	Mains and Services Plant	390,549	262,801	3,882	103,527	20,337	
Meter, Meter Installation and House Regulator	(106)	Meters, Meter Installations and House Regulators	10,594	7,617	185	2,677	115	
Customer Installation Expenses	(3)	Number of Bills	6,902	6,346	10	544	2	
Other Distribution	(110)	Distribution O&M	51,966	35,247	519	13,595	2,605	
Customer Accounts Expense	(3)	Number of Bills	88,990	81,819	129	7,013	29	
Uncollectible	(9)	95% rate RS / 5% Rate CS	12,639	12,007	-	632	-	
Customer Service Expenses	(3)	Number of Bills	179,975	165,473	261	14,183	58	
Administrative and General	(109)	O&M Without Gas Costs	1,250,580	962,490	8,504	240,976	38,609	
Total Pro Forma Operating Costs at Present Revenue	Levels		\$5,824,220_	\$4,237,132	\$70,113	\$1,455,217	\$61,755	

(Cont'd)

## ALLOCATION OF PRO FORMA OPERATION AND MAINTENANCE EXPENSES AT PROPOSED REVENUE LEVELS

Attachment BRK-3 SCHEDULE 4 PAGE 2 OF 2

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50	
PRO FORMA COST OF GAS  Commodity Cost of Purchased Gas			\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -	
OPERATING EXPENSES Transmission:								
Operation Supervision and engineering	(2)	Annual Sales	8,109	5,703	112	2,294	-	
Distribution:								
Mains and Services	(105)	Mains and Services Plant	390,549	262,801	3,882	103,527	20,337	
Meter, Meter Installation and House Regulator	(106)	Meters, Meter Installations and House Regulators	10,594	7,617	185	2,677	115	
Customer Installation Expenses	(3)	Number of Bills	6,902	6,346	10	544	2	
Other Distribution	(110)	Distribution O&M	51,966	35,247	519	13,595	2,605	
Customer Accounts Expense	(3)	Number of Bills	88,990	81,819	129	7,013	29	
Uncollectible	(9)	95% rate RS / 5% Rate CS	12,639	12,007	-	632	-	
Customer Service Expenses	(3)	Number of Bills	179,975	165,473	261	14,183	58	
Administrative and General	(109)	O&M Without Gas Costs	1,255,716	966,444	8,539	241,965	38,768	
otal Pro Forma Operating Costs at Proposed Revenue Levels			\$5,829,356	\$4,241,086	\$70,148	\$1,456,206	\$61,914	

#### **ALLOCATION OF MISCELLANEOUS REVENUES**

Attachment BRK-3 SCHEDULE 5 PAGE 1 OF 1

Large Volume

	Allocator No.	Allocation Method	Residential D20	IndustrialD30		Commercial D40	Interruptible Service D50		
MISCELLANEOUS REVENUES									
Miscellaneous Revenue	(3)	Number of bills	(\$3,850)	(\$3,540)	\$	(6)	(\$303)	\$	(1)
Miscellaneous Supplier Revenues	(11)	Pro Forma Transportation Bills	8,523	-		349	7,825		349
Return Check Fee	(3)	Number of bills	503	462		1	40		-
Collection fees	(3)	Number of bills	3,518	3,235		5	277		1
Late payment charges	(3)	Number of bills	12,697	11,674		18	1,001		4
Total Proforma Miscellaneous Revenues			\$21,391	\$11,831		\$367	\$8,840		\$353

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES NORMALIZED AT PRESENT RATES

Attachment BRK-3 SCHEDULE 6 PAGE 1 OF 5

Large Volume

	Allocator No.		llocation Method	Total	Residential D20	Industrial D30	Commercial D40	Interruptible Service D50
Pro Forma Normalized Revenues. w/o Misc. Rev Pro Forma Normalized Miscellaneous Revenues Gas Cost revenue				\$3,231,063 21,391 3,823,916	\$2,204,835 11,831 2,697,629	\$34,812 367 56,511	\$838,355 8,840 1,069,776	\$153,061 353 
Pro Forma Normalized Rev. w/ Misc. Revenues				\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Net Operating Income Total Pro Forma Normalized Revenues Less: Operation and Maintenance Expenses Less: Gas Costs Less: Depreciation and Amortization Expenses Less: Property Taxes Less: Large Volume Interruptible Service Discount	(101)	Gross Plant		\$7,076,370 (2,000,304) (3,823,916) (506,642) (148,887) (27,450)	\$4,914,295 (1,539,503) (2,697,629) (343,027) (98,974)	\$91,690 (13,602) (56,511) (5,738) (1,806)	\$1,916,971 (385,441) (1,069,776) (132,771) (40,233)	\$153,414 (61,755) - (25,104) (7,874) (27,450)
Net Operating Income				\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base Rate of Return				\$13,961,043 4.077%	\$9,165,257 2.566%	\$146,440 9.583%	\$3,866,088 7.469%	\$783,256 3.987%

(Cont'd)

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES EQUALIZED AT PRESENT RATES

Attachment BRK-3 SCHEDULE 6 PAGE 2 OF 5

Large Volume

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Interruptible Service D50
Historical Rate Base Allowed Rate of Return			\$13,961,043 4.077%	\$9,165,257 4.077%	\$146,440 4.077%	\$3,866,088 4.077%	\$783,256 4.077%
Allowed Net Operating Income			\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Derivation of Pro Forma Equalized Revenues  Net Operating Income  Plus: Operating & Maintenance Expenses  Plus: Gas Costs  Plus: Depreciation and Amortization Expenses  Plus: Property Taxes  Plus: Large Volume Interruptible Service Discount	(101)	Gross Plant	\$569,171 2,000,304 3,823,916 506,642 148,887 27,450	\$373,654 1,539,503 2,697,629 343,027 98,974	\$5,970 13,602 56,511 5,738 1,806	\$157,615 385,441 1,069,776 132,771 40,233	\$31,932 61,755 - 25,104 7,874 27,450
Pro Forma Equalized Revenues w/Misc. Rev.			\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115

(Cont'd)

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES EQUALIZED AT PROPOSED REVENUE LEVELS

#### Attachment BRK-3 SCHEDULE 6 PAGE 3 OF 5

Large Volume

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Interruptible Service D50
LUCTORIO AL Deve Deve			<b>*</b> 40.004.040	<b>****</b>	<b>**</b>	<b>*</b> 0.000.000	<b>\$700.050</b>
HISTORICAL Rate Base Allowed Rate of Return		changed K15 to Petitioner's WACC (CLJ-1)	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Allowed Rate of Return		changed K15 to Petitioner's WACC (CLJ-1)	9.066%	9.066%	9.066%	9.066%	9.066%
Allowed Net Operating Income			\$1,265,708	\$830,921	\$13,276	\$350,500	\$71,010
Derivation of Pro Forma Equalized Revenues							
Net Operating Income			\$1,265,708	\$830,921	\$13,276	\$350,500	\$71,010
Plus: Operating & Maintenance Expenses			2,005,440	1,543,457	13,637	386,430	61,914
Plus: Gas Costs			3,823,916	2,697,629	56,511	1,069,776	-
Plus: Depreciation and Amortization Expenses			506,642	343,027	5,738	132,771	25,104
Plus: Property Taxes	(101)	Gross Plant	148,887	98,974	1,806	40,233	7,874
Plus: Large Volume Interruptible Service Discount			27,450	-			27,450
Pro Forma Equalized Revenues w/Misc. Rev.			\$7,778,043	\$5,514,008	\$90,968	\$1,979,710	\$193,352

(Cont'd)

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES NORMALIZED AT PROPOSED REVENUE LEVELS

Attachment BRK-3 SCHEDULE 6 PAGE 4 OF 5

_Allocator No	Allocation . Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
Subsidy Reduction						
Pro Forma Normalized Revenues w/Misc. Rev at Present Rates Less: Pro Forma Equalized Revenues w/Misc. Rev. at Present Rates		\$7,076,370 7,076,370	\$4,914,295 5,052,787	\$91,690 83,627	\$1,916,971 1,785,836	\$153,414 154,115
Pro Forma Subsidy at Present Rates Proposed Subsidy Reduction Percentage			(138,492) 	8,063 25%	131,135 25%	(701) 
Dra Farma Cultaidu at Dranacad Daviagua Lavala			(402.000)	C 0.47	00.254	(500)
Pro Forma Subsidy at Proposed Revenue Levels Pro Forma Contractual Discount (111)	Gas Costs	-	(103,869) 19,365	6,047 406	98,351 7.679	(526) (27,450)
Pro Forma Equalized Revenues w/Misc. Rev at Proposed Revenue Levels	043 00313	7,778,043	5,514,008	90,968	1,979,710	193,352
Pro Forma Normalized Revenues w/Misc Rev. at Proposed Revenue Levels		\$7,778,043	\$5,429,504	\$97,421	\$2,085,740	\$165,376
Net Operating Income						
Total Pro Forma Normalized Revenues w/Misc. Rev. at Proposed Revenue Levels		\$7,778,043	\$5,429,504	\$97,421	\$2,085,740	\$165,376
Less: Operating & Maintenance Expenses		(2,005,440)	(1,543,457)	(13,637)	(386,430)	(61,914)
Less: Gas Costs		(3,823,916)	(2,697,629)	(56,511)	(1,069,776)	-
Less: Depreciation and Amortization Expenses		(506,642)	(343,027)	(5,738)	(132,771)	(25,104)
Less: Property Taxes (101)	Gross Plant	(148,887)	(98,974)	(1,806)	(40,233)	(7,874)
Less: Large Volume Interruptible Service Discount		(27,450)				(27,450)
Net Operating Income		\$1,265,708	\$746,417	\$19,729	\$456,530	\$43,034
Total HISTORICAL Rate Base Rate of Return		\$13,961,043 9.066%	\$9,165,257 8.144%	\$146,440 13.472%	\$3,866,088 11.809%	\$783,256 5.494%
Natio of Notalin		3.000 /6	0.177/0	10.712/0	11.003/0	J.7J7/0

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#### **SUMMARY OF PRO FORMA REVENUES**

Attachment BRK-3 SCHEDULE 6 PAGE 5 OF 5

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
Pro Forma Normalized Revenues at Present Rates					
Pro Forma Normalized Revenues w/o Misc. Rev Pro Forma Normalized Miscellaneous Revenues	\$7,054,979 21,391	\$4,902,464 11,831	\$91,323 367	\$1,908,131 8,840	\$153,061 353
Total Pro Forma Normalized Revenues w/Misc. Rev.	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Pro Forma Equalized Revenues at Present Rates					
Pro Forma Equalized Revenues w/o Misc. Rev	\$7,054,979	\$5,040,956	\$83,260	\$1,776,996	\$153,762
Pro Forma Equalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Equalized Revenues w/Misc. Rev.	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Pro Forma Normalized Revenues at Proposed Revenue Levels					
Pro Forma Normalized Revenues w/o Misc. Rev	\$7,756,652	\$5,417,673	\$97,054	\$2,076,900	\$165,023
Pro Forma Normalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Normalized Revenues w/Misc. Rev.	\$7,778,043	\$5,429,504	\$97,421	\$2,085,740	\$165,376
Pro Forma Equalized Revenues at Proposed Revenue Levels					
Pro Forma Equalized Revenues w/o Misc. Rev	\$7,756,652	\$5,502,177	\$90,601	\$1,970,870	\$192,999
Pro Forma Equalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Equalized Revenues w/Misc. Rev.	\$7,778,043	\$5,514,008	\$90,968	\$1,979,710	\$193,352

#### NORMALIZED COST OF SERVICE AT PRESENT RATES

Attachment BRK-3 SCHEDULE 7 PAGE 1 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,054,979	\$4,902,464	\$91,323	\$1,908,131	\$153,061
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,250,580	962,490	8,504	240,976	38,609
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 4.08%	\$9,165,257 2.57%	\$146,440 9.58%	\$3,866,088 7.47%	\$783,256 3.99%

(Cont'd)

#### **EQUALIZED COST OF SERVICE AT PRESENT RATES**

#### Attachment BRK-3 SCHEDULE 7 PAGE 2 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,054,979	\$5,040,956	\$83,260	\$1,776,996	\$153,762
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,250,580	962,490	8,504	240,976	38,609
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Historical Rate Base Rate of Return	\$13,961,043 4.08%	\$9,165,257 4.08%	\$146,440 4.08%	\$3,866,088 4.08%	\$783,256 4.08%

#### (Cont'd)

#### **EQUALIZED COST OF SERVICE AT PROPOSED RATES**

#### Attachment BRK-3 SCHEDULE 7 PAGE 3 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,756,652	\$5,502,177	\$90,601	\$1,970,870	\$192,999
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,778,043	\$5,514,008	\$90,968	\$1,979,710	\$193,352
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,255,716	966,444	8,539	241,965	38,768
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,265,708	\$830,921	\$13,276	\$350,500	\$71,010
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 9.066%	\$9,165,257 9.066%	\$146,440 9.066%	\$3,866,088 9.066%	\$783,256 9.066%

(Cont'd)

#### NORMALIZED COST OF SERVICE AT PROPOSED RATES

Attachment BRK-3 SCHEDULE 7 PAGE 4 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,756,652	\$5,417,673	\$97,054	\$2,076,900	\$165,023
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,778,043	\$5,429,504	\$97,421	\$2,085,740	\$165,376
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,255,716	966,444	8,539	241,965	38,768
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,265,708	\$746,417	\$19,729	\$456,530	\$43,034
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 9.066%	\$9,165,257 8.144%	\$146,440 13.472%	\$3,866,088 11.809%	\$783,256 5.494%

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT NORMALIZED RATES OF RETURN (Present Rates)

Attachment BRK-3 SCHEDULE 8 PAGE 1 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,054,979 21,391	\$4,902,464 11,831	\$91,323 367	\$1,908,131 8,840	\$153,061 353
Total Operating Revenues	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,824,220 506,642 148,887 27,450	\$4,237,132 343,027 98,974	\$70,113 5,738 1,806	\$1,455,217 132,771 40,233	\$61,755 25,104 7,874 27,450
Total	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	4.077%	2.566%	9.583%	7.469%	3.987%
Earnings Index	100.00%	62.94%	235.05%	183.20%	97.80%

(Cont'd)

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT EQUALIZED RATES OF RETURN (Present Rates)

Attachment BRK-3 SCHEDULE 8 PAGE 2 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,054,979 21,391	\$5,040,956 11,831	\$83,260 367	\$1,776,996 8,840	\$153,762 353
Total Operating Revenues	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,824,220 506,642 148,887 27,450	\$4,237,132 343,027 98,974	\$70,113 5,738 1,806	\$1,455,217 132,771 40,233	\$61,755 25,104 7,874 27,450
Total	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Historical Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	4.08%	4.08%	4.08%	4.08%	4.08%
Earnings Index	100.00%	100.00%	100.00%	100.00%	100.00%

(Cont'd)

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT EQUALIZED RATES OF RETURN (Proposed Revenue Levels)

Attachment BRK-3 SCHEDULE 8 PAGE 3 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,756,652 21,391	\$5,502,177 11,831	\$90,601 367	\$1,970,870 8,840	\$192,999 353
Total Operating Revenues	\$7,778,043	\$5,514,008	\$90,968	\$1,979,710	\$193,352
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,829,356 506,642 148,887 27,450	\$4,241,086 343,027 98,974	\$70,148 5,738 1,806	\$1,456,206 132,771 40,233	\$61,914 25,104 7,874 27,450
Total	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,265,708	\$830,921	\$13,276	\$350,500	\$71,010
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	9.07%	9.07%	9.07%	9.07%	9.07%
Earnings Index	100.00%	100.00%	100.00%	100.00%	100.00%

(Cont'd)

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT NORMALIZED RATES OF RETURN

(Proposed Revenue Levels)

Attachment BRK-3 SCHEDULE 8 PAGE 4 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,756,652 21,391	\$5,417,673 11,831	\$97,054 367	\$2,076,900 8,840	\$165,023 353
Total Operating Revenues	\$7,778,043	\$5,429,504	\$97,421	\$2,085,740	\$165,376
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,829,356 506,642 148,887 27,450	\$4,241,086 343,027 98,974	\$70,148 5,738 1,806	\$1,456,206 132,771 40,233	\$61,914 25,104 7,874 27,450
Total	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,265,708	\$746,417	\$19,729	\$456,530	\$43,034
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	9.07%	8.14%	13.47%	11.81%	5.49%
Earnings Index	100.00%	89.83%	148.60%	130.25%	60.60%

# COMPARISON OF PRO FORMA OPERATING REVENUES AND RESULTING DOLLAR SUBSIDY LEVELS AT PRESENT AND PROPOSED RATES

Attachment BRK-3 SCHEDULE 9 PAGE 1 OF 1

	Pro Forma	Revenues - Prese	ent Rates	Pro Forma Revenues - Proposed Rates							
Rate Schedule	Revenues at Present Rates	Revenues Required for Equalized Returns	Present Subsidy	Revenues Required for Equalized Returns	Revenues at Proposed Rates	Proposed Calculated Subsidy	Proposed Contractual Discount	Calculated Sub	sidy Reduction Percentage		
Residential	\$4,914,295	\$5,052,787	(\$138,492)	\$5,514,008	\$5,429,504	(\$103,869)	\$19,365	(\$34,623)	25%		
Industrial	91,690	83,627	8,063	90,968	97,421	6,047	406	2,016	25%		
Commercial	1,916,971	1,785,836	131,135	1,979,710	2,085,740	98,351	7,679	32,784	25%		
Large Volume Interruptible Service	153,414	154,115	(701)	193,352	165,376	(526)	(27,450)	(175)	25%		
Total	\$7,076,370	\$7,076,365	\$5	\$7,778,038	\$7,778,041	\$3	\$0	\$2			

#### COMPARISON OF GAS SALES REVENUES AT PRESENT AND PROPOSED RATES

Attachment BRK-3 SCHEDULE 10 PAGE 1 OF 1

	Pre	sent Revenue Lev	vels	Prop	osed Revenue Le	evels	Increase or (Decrease)			
Rate Schedule	Margins at Present Rates	Gas Cost Revenue	Revenues at Present Rates	Margins at Proposed Rates	Gas Cost Revenue	Revenues at Proposed Rates	Amount		Margin %	
Residential	\$2,204,835	\$2,697,629	\$4,902,464	\$2,720,044	\$2,697,629	\$5,417,673	\$515,209	10.51%	23.37%	
Industrial	34,812	56,511	91,323	40,543	56,511	97,054	5,731	6.28%	16.46%	
Commercial	838,355	1,069,776	1,908,131	1,007,124	1,069,776	2,076,900	168,769	8.84%	20.13%	
Large Volume Interruptible Service	153,061		153,061	165,023		165,023	11,962	7.82%	7.82%	
Total	\$3,231,063	\$3,823,916	\$7,054,979	\$3,932,734	\$3,823,916	\$7,756,650	\$701,671	9.95%	21.72%	

#### COMPARISON OF MARGINS AT PRESENT AND PROPOSED RATES

Attachment BRK-3 SCHEDULE 11 PAGE 1 OF 1

Description	Number of Bills	Billing Quantities (therms)	Present Rates (\$/therm)	Pro Forma GCA (\$/therm)	Effective Present Rates (\$/therm)	Margin at Present Rates	Proposed Rates (\$/therm)	Pro Forma Base Cost of Gas (\$/therm)	Proposed Effective Rates (\$/therm)	Margin at Proposed Rates	Increase in Amount	n Margins Percent
Residential: Customer Charge First 120 Therms Next 380 Therms Over 500 Therms	67,846	3,500,706 642,284 6,102	\$11.83 0.3590 0.2245 0.2082	\$0.0000 0.0000 0.0000	\$0.3590 0.2245 0.2082	\$802,618 1,256,753 144,193 1,270	\$14.59 0.4429 0.2769 0.2569	\$0.0000 0.0000 0.0000	\$14.59 0.4429 0.2769 0.2569	\$989,873 1,550,463 177,848 1,568	\$187,255 293,710 33,655 298	23.33% 23.37% 23.34% 23.46%
Total Therms and Margins		4,149,092				\$2,204,834				\$2,719,752	\$514,918	23.35%
Industrial: Customer Charge First 500 Therms Over 500 Therms Total Therms and Margins	107	28,952 65,039 93,991	\$109.18 0.3869 0.1834	\$0.0000 0.0000	\$0.3869 0.1834	\$11,682 11,202 11,928 \$34,812	\$127.15 0.4506 0.2136	\$0.0000 0.0000	\$127.15 0.4506 0.2136	\$13,605 13,046 13,892 \$40,543	\$1,923 1,844 1,964 \$5,731	16.46% 16.46% 16.47%
Commercial: Customer Charge First 120 Therms Next 380 Therms Over 500 Therms	5,815	381,804 639,403 1,869,571	\$36.48 0.2940 0.2132 0.2020	\$0.0000 0.0000 0.0000	\$0.2940 0.2132 0.2020	\$212,131 112,250 136,321 377,653	\$43.82 0.3531 0.2561 0.2427	\$0.0000 0.0000 0.0000	\$43.82 0.3531 0.2561 0.2427	\$254,813 134,815 163,751 453,745	\$42,682 22,565 27,430 76,092	20.12% 20.10% 20.12% 20.15%
Total Therms and Margins  Large Volume Interruptible Service: Customer Charge All Therms  Total Therms and Margins	24	2,890,778 784,297 784,297	\$1,142.34 0.1602	\$0.0000	\$0.1602	\$838,355 \$27,416 125,644 \$153,060	\$1,231.62 0.1727	\$0.0000	\$1,231.62 0.1727	\$1,007,124 \$29,559 135,448 \$165,007	\$168,769 \$2,143 9,804 \$11,947	7.82% 7.80% 7.81%
Total Therms and Margin from Rates  Miscellaneous Revenues	73,792	7,918,158				\$3,231,061 \$21,391				\$3,932,426 \$21,391	\$701,365 \$0	21.71%
Total Margin Including Misc. Revenue						\$3,252,452				\$3,953,817	\$701,365	21.56%

#### REVENUE PROOF AT PROPOSED RATES

Attachment BRK-3 SCHEDULE 12 PAGE 1 OF 1

Description	Number of Bills	Billing Quantities (therms)	Proposed Rates (\$/therm)	Pro Forma Base Cost of Gas (\$/therm)	Proposed Effective Rates (\$/therm)	Margin at Proposed Rates	Misc. Revenues	Total Revenues	Cost-of- Service	(Over)/Under Recovery	(Over)/Under Recovery Percentage
Residential: Customer Charge	67,846		\$14.59		\$14.59	\$989,873					
First 120 Therms	07,010	3,500,706	0.4429	\$0.0000	0.4429	1,550,463					
Next 380 Therms		642,284	0.2769	0.0000	0.2769	177,848					
Over 500 Therms		6,102	0.2569	0.0000	0.2569	1,568_					
Total Therms and Margins		4,149,092				\$2,719,752	\$11,831	\$2,731,583	\$2,731,875	\$292	0.0107%
Industrial:											
Customer Charge	107		\$127.15		\$127.15	\$13,605					
First 500 Therms		28,952	0.4506	\$0.0000	0.4506	13,046					
Over 500 Therms		65,039	0.2136	0.0000	0.2136	13,892					
Total Therms and Margins		93,991				\$40,543	\$367	\$40,910	\$40,910	\$0	0.0000%
Commercial:											
Customer Charge	5,815		\$43.82		\$43.82	\$254,813					
First 120 Therms		381,804	0.3531	\$0.0000	0.3531	134,815					
Next 380 Therms		639,403	0.2561	0.0000	0.2561	163,751					
Over 500 Therms		1,869,571	0.2427	0.0000	0.2427	453,745					
Total Therms and Margins		2,890,778				\$1,007,124	\$8,840	\$1,015,964	\$1,015,964	\$0	0.0000%
Large Volume Interruptible Service:											
Customer Charge	24		\$1,231.62		\$1,231.62	\$29,559					
All Therms		784,297	0.1727	\$0.0000	0.1727	135,448					
Total Therms and Margins		784,297				\$165,007	\$353	\$165,360	\$165,376	\$16	0.0097%
Total Therms and Revenue	73,792	7,918,158				\$3,932,426	\$21,391	\$3,953,817	\$3,954,125	\$308	0.0078%

# TYPICAL BILL COMPARISON RESIDENTIAL - D20

Attachment BRK-3 SCHEDULE 13 PAGE 1 OF 4

Level of Usage (therms)	Current Bill (\$)	Proposed Bill (\$)	Dollar Increase (\$)	Percent Increase (%)	Gas Cost Recovery (\$)	Total Current Bill (\$)	Total Proposed Bill (\$)	Percent Increase (%)
0	\$11.83	\$14.59	\$2.76	23.33%	\$0.00	\$11.83	\$14.59	23.33%
10	15.42	19.02	3.60	23.35%	4.83	20.25	23.85	17.78%
20	19.01	23.45	4.44	23.36%	9.66	28.67	33.11	15.49%
30	22.60	27.88	5.28	23.36%	14.49	37.09	42.37	14.24%
40	26.19	32.31	6.12	23.37%	19.32	45.51	51.63	13.45%
50	29.78	36.74	6.96	23.37%	24.15	53.93	60.89	12.91%
60	33.37	41.16	7.79	23.34%	28.97	62.34	70.13	12.50%
70	36.96	45.59	8.63	23.35%	33.80	70.76	79.39	12.20%
80	40.55	50.02	9.47	23.35%	38.63	79.18	88.65	11.96%
90	44.14	54.45	10.31	23.36%	43.46	87.60	97.91	11.77%
100	47.73	58.88	11.15	23.36%	48.29	96.02	107.17	11.61%
125	56.03	69.12	13.09	23.36%	60.36	116.39	129.48	11.25%
150	61.65	76.05	14.40	23.36%	72.44	134.09	148.49	10.74%
175	67.26	82.97	15.71	23.36%	84.51	151.77	167.48	10.35%
200	72.87	89.89	17.02	23.36%	96.58	169.45	186.47	10.04%
250	84.10	103.74	19.64	23.35%	120.73	204.83	224.47	9.59%
300	95.32	117.58	22.26	23.35%	144.87	240.19	262.45	9.27%
400	117.77	145.27	27.50	23.35%	193.16	310.93	338.43	8.84%
500	140.22	172.96	32.74	23.35%	241.45	381.67	414.41	8.58%

(Cont'd)

# TYPICAL BILL COMPARISON INDUSTRIAL - D30

Attachment BRK-3 SCHEDULE 13 PAGE 2 OF 4

Level of Usage (therms)	Current Bill (\$)	Proposed Bill (\$)	Dollar Increase (\$)	Percent Increase (%)	Gas Cost Recovery (\$)	Total Current Bill (\$)	Total Proposed Bill (\$)	Percent Increase (%)
0	\$109.18	\$127.15	\$17.97	16.46%	\$0.00	\$109.18	\$127.15	16.46%
100	147.87	172.21	24.34	16.46%	48.29	196.16	220.50	12.41%
200	186.56	217.27	30.71	16.46%	96.58	283.14	313.85	10.85%
300	225.25	262.33	37.08	16.46%	144.87	370.12	407.20	10.02%
400	263.94	307.39	43.45	16.46%	193.16	457.10	500.55	9.51%
500	302.63	352.45	49.82	16.46%	241.45	544.08	593.90	9.16%
600	320.97	373.81	52.84	16.46%	289.74	610.71	663.55	8.65%
700	339.31	395.17	55.86	16.46%	338.03	677.34	733.20	8.25%
800	357.65	416.53	58.88	16.46%	386.32	743.97	802.85	7.91%
900	375.99	437.89	61.90	16.46%	434.61	810.60	872.50	7.64%
1,000	394.33	459.25	64.92	16.46%	482.90	877.23	942.15	7.40%
1,500	486.03	566.05	80.02	16.46%	724.35	1,210.38	1,290.40	6.61%
2,000	577.73	672.85	95.12	16.46%	965.80	1,543.53	1,638.65	6.16%
2,500	669.43	779.65	110.22	16.46%	1,207.25	1,876.68	1,986.90	5.87%
3,000	761.13	886.45	125.32	16.46%	1,448.70	2,209.83	2,335.15	5.67%
3,500	852.83	993.25	140.42	16.47%	1,690.15	2,542.98	2,683.40	5.52%
4,000	944.53	1,100.05	155.52	16.47%	1,931.60	2,876.13	3,031.65	5.41%
4,500	1,036.23	1,206.85	170.62	16.47%	2,173.05	3,209.28	3,379.90	5.32%
5,000	1,127.93	1,313.65	185.72	16.47%	2,414.50	3,542.43	3,728.15	5.24%

(Cont'd)

# TYPICAL BILL COMPARISON COMMERCIAL - D40

Attachment BRK-3 SCHEDULE 13 PAGE 3 OF 4

Level of	Current	Proposed	Dollar	Percent	Gas Cost	Total Current	Total Proposed	Percent
Usage	Bill	Bill	Increase	Increase	Recovery	Bill	Bill	Increase
(therms)	(\$)	(\$)	(\$)	(%)	(\$)	(\$)	(\$)	(%)
0	\$36.48	\$43.82	\$7.34	20.12%	\$0.00	\$36.48	\$43.82	20.12%
25	43.83	52.65	8.82	20.12%	12.07	55.90	64.72	15.78%
50	51.18	61.48	10.30	20.13%	24.15	75.33	85.63	13.67%
100	65.88	79.13	13.25	20.11%	48.29	114.17	127.42	11.61%
150	78.16	93.88	15.72	20.11%	72.44	150.60	166.32	10.44%
200	88.82	106.68	17.86	20.11%	96.58	185.40	203.26	9.63%
250	99.48	119.49	20.01	20.11%	120.73	220.21	240.22	9.09%
300	110.14	132.29	22.15	20.11%	144.87	255.01	277.16	8.69%
350	120.80	145.10	24.30	20.12%	169.02	289.82	314.12	8.38%
400	131.46	157.90	26.44	20.11%	193.16	324.62	351.06	8.14%
450	142.12	170.71	28.59	20.12%	217.31	359.43	388.02	7.95%
500	152.78	183.51	30.73	20.11%	241.45	394.23	424.96	7.79%
600	172.98	207.78	34.80	20.12%	289.74	462.72	497.52	7.52%
700	193.18	232.05	38.87	20.12%	338.03	531.21	570.08	7.32%
800	213.38	256.32	42.94	20.12%	386.32	599.70	642.64	7.16%
900	233.58	280.59	47.01	20.13%	434.61	668.19	715.20	7.04%
1,000	253.78	304.86	51.08	20.13%	482.90	736.68	787.76	6.93%
1,500	354.78	426.21	71.43	20.13%	724.35	1,079.13	1,150.56	6.62%
2,000	455.78	547.56	91.78	20.14%	965.80	1,421.58	1,513.36	6.46%

(Cont'd)

# TYPICAL BILL COMPARISON LARGE VOLUME INTERUPTIBLE SERVICE - D50

Attachment BRK-3 SCHEDULE 13 PAGE 4 OF 4

						Total	Total	
Level of	Current	Proposed	Dollar	Percent	Gas Cost	Current	Proposed	Percent
Usage	Bill	Bill	Increase	Increase	Recovery	Bill	Bill	Increase
(therms)	(\$)	(\$)	(\$)	(%)	(\$)	(\$)	(\$)	(%)
0	\$1,142.34	\$1,231.62	\$89.28	7.82%	\$0.00	\$1,142.34	\$1,231.62	7.82%
1,000	1,302.54	1,404.32	101.78	7.81%	482.90	1,785.44	1,887.22	5.70%
5,000	1,943.34	2,095.12	151.78	7.81%	2,414.50	4,357.84	4,509.62	3.48%
10,000	2,744.34	2,958.62	214.28	7.81%	4,829.00	7,573.34	7,787.62	2.83%
15,000	3,545.34	3,822.12	276.78	7.81%	7,243.50	10,788.84	11,065.62	2.57%
20,000	4,346.34	4,685.62	339.28	7.81%	9,658.00	14,004.34	14,343.62	2.42%
25,000	5,147.34	5,549.12	401.78	7.81%	12,072.50	17,219.84	17,621.62	2.33%
30,000	5,948.34	6,412.62	464.28	7.81%	14,487.00	20,435.34	20,899.62	2.27%
35,000	6,749.34	7,276.12	526.78	7.80%	16,901.50	23,650.84	24,177.62	2.23%
40,000	7,550.34	8,139.62	589.28	7.80%	19,316.00	26,866.34	27,455.62	2.19%
45,000	8,351.34	9,003.12	651.78	7.80%	21,730.50	30,081.84	30,733.62	2.17%
50,000	9,152.34	9,866.62	714.28	7.80%	24,145.00	33,297.34	34,011.62	2.15%
60,000	10,754.34	11,593.62	839.28	7.80%	28,974.00	39,728.34	40,567.62	2.11%
70,000	12,356.34	13,320.62	964.28	7.80%	33,803.00	46,159.34	47,123.62	2.09%
80,000	13,958.34	15,047.62	1,089.28	7.80%	38,632.00	52,590.34	53,679.62	2.07%
90,000	15,560.34	16,774.62	1,214.28	7.80%	43,461.00	59,021.34	60,235.62	2.06%
100,000	17,162.34	18,501.62	1,339.28	7.80%	48,290.00	65,452.34	66,791.62	2.05%
110,000	18,764.34	20,228.62	1,464.28	7.80%	53,119.00	71,883.34	73,347.62	2.04%
120,000	20,366.34	21,955.62	1,589.28	7.80%	57,948.00	78,314.34	79,903.62	2.03%

#### **SCHEDULE OF ALLOCATION FACTORS**

Attachment BRK-4 Schedule 1 Page 1 of 1

Allocator Name	Allocator No.	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50	Total
Input Allocators						
Pro Forma Annual Throughput	(1)	4,149,092	93,991	2,890,777	784,297	7,918,157
	(1)	52.3998%	1.1870%	36.5082%	9.9050%	100.0000%
Pro Forma Annual Sales	(2) (2)	4,149,092 70.3369%	81,119 1.3752%	1,668,673 28.2879%	0.0000%	5,898,884 100.0000%
Pro Forma Number of Bills	(3)	67,846	107	5,815	24	73,792
	(3)	91.9422%	0.1450%	7.8803%	0.0325%	100.0000%
Design Day Throughput	(4)	5,911.82	125.82	3,348.97	623.39	10,010.00
	(4)	59.0592%	1.2569%	33.4562%	6.2277%	100.0000%
Meters Weighting Factor Pro Forma Meters	(7) (7) (7)	1.0 67,846 71.9048%	15.4 1,648 1.7464%	4.1 23,842 25.2678%	42.5 1,020 1.0810%	94,355 100.0000%
Services Weighting Factor Pro Forma Services	(8) (8) (8)	1.0 67,846 84.9174%	6.0 642 0.8035%	1.9 11,049 13.8285%	15.0 360 0.4506%	79,897 100.0000%
95% Rate RS / 5% Rate CS	(9) (9)	95.0000%	0.0000%	5.0000%	0.0000%	100.0000%
100% Industrial	(10) (10)	0.0000%	100.0000%	0.0000%	0.0000%	100.0000%
Pro Forma Transportation Bills	(11)	0	24	538	24	586
	(11)	0.0000%	4.0956%	91.8089%	4.0955%	100.0000%
Internally-Generated Allocators						
Gross Plant	(101)	\$13,445,959	\$245,387	\$5,465,897	\$1,069,748	\$20,226,991
	(101)	66.4752%	1.2132%	27.0228%	5.2887%	99.9999%
Distribution Mains Plant	(104)	\$7,530,186	\$130,558	\$3,806,488	\$844,759	12,311,991
	(104)	61.1614%	1.0604%	30.9169%	6.8613%	100.0000%
Mains and Services Plant	(105)	\$11,165,502	\$164,956	\$4,398,486	\$864,049	16,592,993
	(105)	67.2905%	0.9941%	26.5081%	5.2073%	100.0000%
Meters, Meter Installations and House Regulators	(106)	\$642,864	\$15,613	\$225,907	\$9,665	894,049
	(106)	71.9048%	1.7463%	25.2679%	1.0810%	100.0000%
Subtotal Gross Plant	(108)	\$12,493,160	\$227,998	\$5,078,575	\$993,944	18,793,677
	(108)	66.4752%	1.2132%	27.0228%	5.2887%	99.9999%
O&M Without Gas Costs	(109)	\$577,013	\$5,098	\$144,465	\$23,146	\$749,722
	(109)	76.9636%	0.6800%	19.2691%	3.0873%	100.0000%
Distribution O&M	(110)	\$276,764	\$4,077	\$106,748	\$20,454	\$408,043
	(110)	67.8272%	0.9992%	26.1610%	5.0127%	100.0001%
Gas Costs	(111)	\$2,697,629	\$56,511	\$1,069,776	\$0	\$3,823,916
	(111)	70.5463%	1.4778%	27.9759%	0.0000%	100.0000%

#### **ALLOCATION OF FAIR VALUE RATE BASE**

Attachment BRK-4 SCHEDULE 2 PAGE 1 OF 1

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
GROSS PLANT	7 modator 140.	Wictiod	Total			D+0	
Distribution:							
Mains:							
Customer	(3)	Number of Bills	\$ 1,846,799	\$1,697,987	\$2,678	\$145,533	\$600
Commodity	(1)	Annual Throughput	\$ 5,232,596	\$2,741,870	62,111	1,910,327	518,289
Demand	(4)	Design Day Throughput	\$ 5,232,596	3,090,329	65,769	1,750,628	325,870
Land and Land Rights	(104)	Distributions Mains Plant	\$46,086	28,187	489	14,248	3,162
Structures and Improvements	(104)	Distributions Mains Plant	39,942	24,429	424	12,349	2,741
Measuring and Regulating Equipment	(104)	Distributions Mains Plant	110,036	67,300	1,167	34,020	7,550
Industrial Measuring and Regulating Equipment	(104)	100% industrial	32,553	-	32,553	34,020	7,550
Services	(8)	Direct	4,281,001	3,635,316	34,398	591,998	19,290
Meters	(7)	Direct	791,240	568,940	13,818	199,929	8,553
Meter Installations	(7)	Direct	16,147	11,609	282	4,080	175
House Regulators	(7)	Direct	86,663	62,315	1,513	21,898	937
Transmission:	(1)	Direct	80,003	02,313	1,515	21,090	931
Structures and Improvements	(1)	Annual Throughput	83,079	43,533	986	30,331	8,229
Mains	(1)	Annual Throughput	277,307	145,308	3,292	101,240	27,467
Measuring and Regulating Equipment	` '	Annual Throughput	717,630	376,037	3,292 8,518	261,994	71,081
0 0 1 1	(1)	Subtotal Gross Plant		,	,	,	,
General and Intangible Plant	(108)	Subtotal Gross Plant	1,433,315	952,799	17,389	387,322	75,804
Total Gross Plant			\$20,226,990	\$13,445,959	\$245,387	\$5,465,897	\$1,069,748
DEPRECIATION RESERVE (Accumulated Deprecia	ation MSFR1, page	203)					
Distribution:	anon morning page	<u></u>					
Mains	(104)	Distributions Mains Plant	(3,724,346)	(\$2,277,862)	(\$39,493)	(\$1,151,452)	(\$255,539)
Structures and Improvements	(104)	Distributions Mains Plant	(3,852)	(2,356)	(41)	(1,191)	(264)
Measuring and Regulating Equipment	(104)	Distributions Mains Plant	(36,694)	(22,443)	(389)	(11,345)	(2,518)
Industrial Measuring and Regulating Equipment	(10)	100% industrial	(33,356)	(22,110)	(33,356)	(11,010)	(2,010)
Services	(8)	Direct	(1,687,229)	(1,432,751)	(13,557)	(233,318)	(7,603)
Meters	(7)	Direct	(416,155)	(299,236)	(7,268)	(105,153)	(4,499)
Meter Installations	(7)	Direct	(14,069)	(10,116)	(246)	(3,555)	(152)
House Regulators	(7)	Direct	(65,413)	(47,035)	(1,142)	(16,528)	(707)
Transmission:	(1)	Direct	(00,410)	(47,033)	(1,142)	(10,320)	(101)
Structures and Improvements	(1)	Annual Throughput	(129)	(68)	(2)	(47)	(13)
Mains	(1)	Annual Throughput	(1,470)	(770)	(17)	(537)	(146)
Measuring and Regulating Equipment	(1)	Annual Throughput	(1,531)	(802)	(17)	(559)	(152)
General and Intangible Plant	(108)	Subtotal Gross Plant	(682,827)	(453,911)	(8,284)	(184,519)	(36,113)
General and intangible Flant	(100)	Subtotal Gloss Flant	(002,021)	(433,911)	(0,204)	(104,519)	(30,113)
Total Depreciation Reserve			(\$6,667,071)	(\$4,547,350)	(\$103,813)	(\$1,708,204)	(\$307,706)
OTHER BASE RATE COMPONENTS							
Materials and Supplies	(101)	Gross Plant	\$401,124	266,648	4,866	108,395	21,214
Total Other Base Rate Components			\$401,124	\$266,648	\$4,866	\$108,395	\$21,214
Total HISTORICAL Value Rate Base			\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256

#### **ALLOCATION OF DEPREPCIATION AND AMORTIZATION EXPENSES**

Attachment BRK-4 SCHEDULE 3 PAGE 1 OF 1

Large Volume

		Allocation		Residential	Industrial	Commercial	Interruptible Service
	Allocator No.	Method	Total	D20	D30	D40	D50
<u>Distribution:</u>							
Mains	(104)	Distribution Mains Plant	\$241,315	\$147,592	\$2,559	\$74,607	\$16,557
Structures and Improvements	(104)	Distribution Mains Plant	935	572	10	289	64
Measuring and Regulating Equipment	(104)	Distribution Mains Plant	3,395	2,076	36	1,050	233
Industrial Measuring and Regulating Equipment	(10)	100% industrial	339	0	339	0	0
Services	(8)	Direct	118,584	100,699	953	16,398	534
Meters	(7)	Direct	21,363	15,361	373	5,398	231
Meter Installations	(7)	Direct	281	202	5	71	3
House Regulators	(7)	Direct	1,855	1,334	32	469	20
<u>Transmission:</u>							
Structures and Improvements	(1)	Annual Throughput	1,554	815	18	567	154
Mains	(1)	Annual Throughput	5,879	3,081	70	2,146	582
Measuring and Regulating Equipment	(1)	Annual Throughput	18,371	9,626	218	6,707	1,820
General and Intangible Plant	(108)	Subtotal Gross Plant	92,771	61,669	1,125	25,069	4,906
Total Depreciation and Amortization Expenses			\$506,642	\$343,027	\$5,738	\$132,771	\$25,104

## ALLOCATION OF PRO FORMA OPERATION AND MAINTENANCE EXPENSES AT PRESENT REVENUE LEVELS

Attachment BRK-4 SCHEDULE 4 PAGE 1 OF 2

Large Volume

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Interruptible Service D50
PRO FORMA COST OF GAS Commodity Cost of Purchased Gas			\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
OPERATING EXPENSES							
Transmission:							
Operation Supervision and engineering	(2)	Annual Sales	8,109	5,703	112	2,294	-
Distribution:							
Mains and Services	(105)	Mains and Services Plant	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	(106)	Meters, Meter Installations and House Regulators	10,594	7,617	185	2,677	115
Customer Installation Expenses	(3)	Number of Bills	6,902	6,346	10	544	2
Other Distribution	(110)	Distribution O&M	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	(3)	Number of Bills	88,990	81,819	129	7,013	29
Uncollectible	(9)	95% rate RS / 5% Rate CS	12,639	12,007	-	632	-
Customer Service Expenses	(3)	Number of Bills	179,975	165,473	261	14,183	58
Administrative and General	(109)	O&M Without Gas Costs	1,250,580	962,490	8,504	240,976	38,609
otal Pro Forma Operating Costs at Present Revenue	Levels		\$5,824,220	\$4,237,132	\$70,113	\$1,455,217	\$61,755

(Cont'd)

## ALLOCATION OF PRO FORMA OPERATION AND MAINTENANCE EXPENSES AT PROPOSED REVENUE LEVELS

Attachment BRK-4 SCHEDULE 4 PAGE 2 OF 2

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
PRO FORMA COST OF GAS  Commodity Cost of Purchased Gas			\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
OPERATING EXPENSES Transmission:							
Operation Supervision and engineering	(2)	Annual Sales	8,109	5,703	112	2,294	-
Distribution:							
Mains and Services	(105)	Mains and Services Plant	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	(106)	Meters, Meter Installations and House Regulators	10,594	7,617	185	2,677	115
Customer Installation Expenses	(3)	Number of Bills	6,902	6,346	10	544	2
Other Distribution	(110)	Distribution O&M	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	(3)	Number of Bills	88,990	81,819	129	7,013	29
Uncollectible	(9)	95% rate RS / 5% Rate CS	12,639	12,007	-	632	-
Customer Service Expenses	(3)	Number of Bills	179,975	165,473	261	14,183	58
Administrative and General	(109)	O&M Without Gas Costs	1,255,716	966,444	8,539	241,965	38,768
Total Pro Forma Operating Costs at Proposed Revenue	e Levels		\$5,829,356	\$4,241,086	\$70,148	\$1,456,206	\$61,914

#### **ALLOCATION OF MISCELLANEOUS REVENUES**

Attachment BRK-4 SCHEDULE 5 PAGE 1 OF 1

Large Volume

	Allocator No.	Allocation Method	Total	Residential D20	ustrial 030	Commercial D40	S	rruptible ervice D50
MISCELLANEOUS REVENUES								
Miscellaneous Revenue	(3)	Number of bills	(\$3,850)	(\$3,540)	\$ (6)	(\$303)	\$	(1)
Miscellaneous Supplier Revenues	(11)	Pro Forma Transportation Bills	8,523	-	349	7,825		349
Return Check Fee	(3)	Number of bills	503	462	1	40		-
Collection fees	(3)	Number of bills	3,518	3,235	5	277		1
Late payment charges	(3)	Number of bills	12,697	11,674	18	1,001		4
Total Proforma Miscellaneous Revenues			\$21,391	\$11,831	\$367	\$8,840		\$353

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES NORMALIZED AT PRESENT RATES

#### Attachment BRK-4 SCHEDULE 6 PAGE 1 OF 5

Large Volume

		Allocation		Residential	Industrial	Commercial	Interruptible Service
	Allocator No.	Method	Total	D20	D30	D40	D50
Pro Forma Normalized Revenues. w/o Misc. Rev Pro Forma Normalized Miscellaneous Revenues Gas Cost revenue			\$3,231,063 21,391 3,823,916	\$2,204,835 11,831 2,697,629	\$34,812 367 56,511	\$838,355 8,840 1,069,776	\$153,061 353 
Pro Forma Normalized Rev. w/ Misc. Revenues			\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Net Operating Income Total Pro Forma Normalized Revenues Less: Operation and Maintenance Expenses Less: Gas Costs Less: Depreciation and Amortization Expenses Less: Property Taxes Less: Large Volume Interruptible Service Discount	(101)	Gross Plant	\$7,076,370 (2,000,304) (3,823,916) (506,642) (148,887) (27,450)	\$4,914,295 (1,539,503) (2,697,629) (343,027) (98,974)	\$91,690 (13,602) (56,511) (5,738) (1,806)	\$1,916,971 (385,441) (1,069,776) (132,771) (40,233)	\$153,414 (61,755) - (25,104) (7,874) (27,450)
Net Operating Income			\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base Rate of Return			\$13,961,043 4.077%	\$9,165,257 2.566%	\$146,440 9.583%	\$3,866,088 7.469%	\$783,256 3.987%

(Cont'd)

Large Volume

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES EQUALIZED AT PRESENT RATES

#### Attachment BRK-4 SCHEDULE 6 PAGE 2 OF 5

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Interruptible Service D50
Historical Rate Base Allowed Rate of Return			\$13,961,043 4.077%	\$9,165,257 4.077%	\$146,440 4.077%	\$3,866,088 4.077%	\$783,256 4.077%
Allowed Nate of Neturn			4.07770	4.07776	4.07776	4.07776	4.07776
Allowed Net Operating Income			\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Derivation of Pro Forma Equalized Revenues							
Net Operating Income			\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Plus: Operating & Maintenance Expenses			2,000,304	1,539,503	13,602	385,441	61,755
Plus: Gas Costs			3,823,916	2,697,629	56,511	1,069,776	-
Plus: Depreciation and Amortization Expenses			506,642	343,027	5,738	132,771	25,104
Plus: Property Taxes	(101)	Gross Plant	148,887	98,974	1,806	40,233	7,874
Plus: Large Volume Interruptible Service Discount			27,450		-		27,450
Pro Forma Equalized Revenues w/Misc. Rev.			\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115

(Cont'd)

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES EQUALIZED AT PROPOSED REVENUE LEVELS

#### Attachment BRK-4 SCHEDULE 6 PAGE 3 OF 5

Large Volume

	Alla satas Na	Allocation	Tatal	Residential	Industrial	Commercial	Interruptible Service
	Allocator No.	Method	Total	D20	D30	D40	D50
HISTORICAL Rate Base			\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Allowed Rate of Return		changed K15 to OUCC's WACC (LDC-5)	7.940%	7.940%	7.940%	7.940%	7.940%
Allowed Net Operating Income			\$1,108,507	\$727,720	\$11,627	\$306,967	\$62,191
Derivation of Pro Forma Equalized Revenues							
Net Operating Income			\$1,108,507	\$727,720	\$11,627	\$306,967	\$62,191
Plus: Operating & Maintenance Expenses			2,005,440	1,543,457	13,637	386,430	61,914
Plus: Gas Costs			3,823,916	2,697,629	56,511	1,069,776	-
Plus: Depreciation and Amortization Expenses			506,642	343,027	5,738	132,771	25,104
Plus: Property Taxes	(101)	Gross Plant	148,887	98,974	1,806	40,233	7,874
Plus: Large Volume Interruptible Service Discount			27,450				27,450
Pro Forma Equalized Revenues w/Misc. Rev.			\$7,620,842	\$5,410,807	\$89,319	\$1,936,177	\$184,533

(Cont'd)

## CALCULATION OF PRO FORMA NET OPERATING INCOME AND REVENUES NORMALIZED AT PROPOSED REVENUE LEVELS

#### Attachment BRK-4 SCHEDULE 6 PAGE 4 OF 5

	Allocator No.	Allocation Method	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
Subsidy Reduction							
Pro Forma Normalized Revenues w/Misc. Rev at Present Rates Less: Pro Forma Equalized Revenues w/Misc. Rev. at Present Rates			\$7,076,370 7,076,370	\$4,914,295 5,052,787	\$91,690 83,627	\$1,916,971 1,785,836	\$153,414 154,115
Pro Forma Subsidy at Present Rates Proposed Subsidy Reduction Percentage			-	(138,492) 	8,063 25%	131,135 25%	(701) 25%
Pro Forma Subsidy at Proposed Revenue Levels Pro Forma Contractual Discount Pro Forma Equalized Revenues w/Misc. Rev at Proposed Revenue Lev	(111)	Gas Costs	- - 7,620,842	(103,869) 19,365 5,410,807	6,047 406 89,319	98,351 7,679 1,936,177	(526) (27,450) 184,533
FIO FOITIIA Equalized Neverlues Wivilst. Nev at Fioposed Neverlue Lev	eis		7,020,042	5,410,807	09,319_	1,930,177	164,333_
Pro Forma Normalized Revenues w/Misc Rev. at Proposed Revenue	Levels		\$7,620,842	\$5,326,303	\$95,772	\$2,042,207	\$156,557
Net Operating Income							
Total Pro Forma Normalized Revenues w/Misc. Rev. at Proposed Reve Less: Operating & Maintenance Expenses Less: Gas Costs Less: Depreciation and Amortization Expenses Less: Property Taxes Less: Large Volume Interruptible Service Discount	nue Levels (101)	Gross Plant	\$7,620,842 (2,005,440) (3,823,916) (506,642) (148,887) (27,450)	\$5,326,303 (1,543,457) (2,697,629) (343,027) (98,974)	\$95,772 (13,637) (56,511) (5,738) (1,806)	\$2,042,207 (386,430) (1,069,776) (132,771) (40,233)	\$156,557 (61,914) - (25,104) (7,874) (27,450)
Net Operating Income			\$1,108,507	\$643,216	\$18,080	\$412,997	\$34,215
Total HISTORICAL Rate Base Rate of Return			\$13,961,043 7.940%	\$9,165,257 7.018%	\$146,440 12.346%	\$3,866,088 10.683%	\$783,256 4.368%

(Cont'd)

#### **SUMMARY OF PRO FORMA REVENUES**

#### Attachment BRK-4 SCHEDULE 6 PAGE 5 OF 5

					Large Volume Interruptible
	Total	Residential D20	Industrial D30	Commercial D40	Service D50
Pro Forma Normalized Revenues at Present Rates					
Pro Forma Normalized Revenues w/o Misc. Rev Pro Forma Normalized Miscellaneous Revenues	\$7,054,979 21,391	\$4,902,464 11,831	\$91,323 367	\$1,908,131 8,840	\$153,061 353
Total Pro Forma Normalized Revenues w/Misc. Rev.	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Pro Forma Equalized Revenues at Present Rates					
Pro Forma Equalized Revenues w/o Misc. Rev	\$7,054,979	\$5,040,956	\$83,260	\$1,776,996	\$153,762
Pro Forma Equalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Equalized Revenues w/Misc. Rev.	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Pro Forma Normalized Revenues at Proposed Revenue Levels					
Pro Forma Normalized Revenues w/o Misc. Rev	\$7,599,451	\$5,314,472	\$95,405	\$2,033,367	\$156,204
Pro Forma Normalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Normalized Revenues w/Misc. Rev.	\$7,620,842	\$5,326,303	\$95,772	\$2,042,207	\$156,557
Pro Forma Equalized Revenues at Proposed Revenue Levels					
Pro Forma Equalized Revenues w/o Misc. Rev	\$7,599,451	\$5,398,976	\$88,952	\$1,927,337	\$184,180
Pro Forma Equalized Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Pro Forma Equalized Revenues w/Misc. Rev.	\$7,620,842	\$5,410,807	\$89,319	\$1,936,177	\$184,533

#### NORMALIZED COST OF SERVICE AT PRESENT RATES

Attachment BRK-4 SCHEDULE 7 PAGE 1 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,054,979	\$4,902,464	\$91,323	\$1,908,131	\$153,061
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,250,580	962,490	8,504	240,976	38,609
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 4.08%	\$9,165,257 2.57%	\$146,440 9.58%	\$3,866,088 7.47%	\$783,256 3.99%

(Cont'd)

#### **EQUALIZED COST OF SERVICE AT PRESENT RATES**

#### Attachment BRK-4 SCHEDULE 7 PAGE 2 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,054,979	\$5,040,956	\$83,260	\$1,776,996	\$153,762
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,250,580	962,490	8,504	240,976	38,609
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Historical Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	4.08%	4.08%	4.08%	4.08%	4.08%

#### (Cont'd)

#### **EQUALIZED COST OF SERVICE AT PROPOSED RATES**

#### Attachment BRK-4 SCHEDULE 7 PAGE 3 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,599,451	\$5,398,976	\$88,952	\$1,927,337	\$184,180
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,620,842	\$5,410,807	\$89,319	\$1,936,177	\$184,533
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,255,716	966,444	8,539	241,965	38,768
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,108,507	\$727,720	\$11,627	\$306,967	\$62,191
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 7.940%	\$9,165,257 7.940%	\$146,440 7.940%	\$3,866,088 7.940%	\$783,256 7.940%

(Cont'd)

#### NORMALIZED COST OF SERVICE AT PROPOSED RATES

Attachment BRK-4 SCHEDULE 7 PAGE 4 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales	\$7,599,451	\$5,314,472	\$95,405	\$2,033,367	\$156,204
Miscellaneous Revenues	21,391	11,831	367	8,840	353
Total Operating Revenues	\$7,620,842	\$5,326,303	\$95,772	\$2,042,207	\$156,557
Operating Expenses					
Commodity Cost of Purchased Gas Transmission Expenses:	\$3,823,916	\$2,697,629	\$56,511	\$1,069,776	\$ -
Operation Supervision and engineering Distribution Expenses:	8,109	5,703	112	2,294	-
Mains and Services	390,549	262,801	3,882	103,527	20,337
Meter, Meter Installation and House Regulator	10,594	7,617	185	2,677	115
Customer Installation Expenses	6,902	6,346	10	544	2
Other Distribution	51,966	35,247	519	13,595	2,605
Customer Accounts Expense	88,990	81,819	129	7,013	29
Uncollectible	12,639	12,007	-	632	-
Customer Service Expense	179,975	165,473	261	14,183	58
Administrative and General	1,255,716	966,444	8,539	241,965	38,768
Depreciation and Amortization Expense	506,642	343,027	5,738	132,771	25,104
Property Taxes	148,887	98,974	1,806	40,233	7,874
Large Volume Interruptible Service Discount	27,450				27,450
Total Operating Expenses	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,108,507	\$643,216	\$18,080	\$412,997	\$34,215
Total HISTORICAL Rate Base Rate of Return	\$13,961,043 7.940%	\$9,165,257 7.018%	\$146,440 12.346%	\$3,866,088 10.683%	\$783,256 4.368%

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT NORMALIZED RATES OF RETURN (Present Rates)

Attachment BRK-4 SCHEDULE 8 PAGE 1 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,054,979 21,391	\$4,902,464 11,831	\$91,323 367	\$1,908,131 8,840	\$153,061 353
Total Operating Revenues	\$7,076,370	\$4,914,295	\$91,690	\$1,916,971	\$153,414
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,824,220 506,642 148,887 27,450	\$4,237,132 343,027 98,974	\$70,113 5,738 1,806	\$1,455,217 132,771 40,233	\$61,755 25,104 7,874 27,450
Total	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$235,162	\$14,033	\$288,750	\$31,231
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	4.077%	2.566%	9.583%	7.469%	3.987%
Earnings Index	100.00%	62.94%	235.05%	183.20%	97.80%

(Cont'd)

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT EQUALIZED RATES OF RETURN (Present Rates)

Attachment BRK-4 SCHEDULE 8 PAGE 2 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,054,979 21,391	\$5,040,956 11,831	\$83,260 367	\$1,776,996 8,840	\$153,762 353
Total Operating Revenues	\$7,076,370	\$5,052,787	\$83,627	\$1,785,836	\$154,115
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,824,220 506,642 148,887 27,450	\$4,237,132 343,027 98,974	\$70,113 5,738 1,806	\$1,455,217 132,771 40,233	\$61,755 25,104 7,874 27,450
Total	6,507,199	4,679,133	77,657	1,628,221	122,183
Net Operating Income	\$569,171	\$373,654	\$5,970	\$157,615	\$31,932
Historical Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	4.08%	4.08%	4.08%	4.08%	4.08%
Earnings Index	100.00%	100.00%	100.00%	100.00%	100.00%

(Cont'd)

# STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT EQUALIZED RATES OF RETURN (Proposed Revenue Levels)

Attachment BRK-4 SCHEDULE 8 PAGE 3 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,599,451 21,391	\$5,398,976 11,831	\$88,952 367	\$1,927,337 8,840	\$184,180 353
Total Operating Revenues	\$7,620,842	\$5,410,807	\$89,319	\$1,936,177	\$184,533
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,829,356 506,642 148,887 27,450	\$4,241,086 343,027 98,974	\$70,148 5,738 1,806	\$1,456,206 132,771 40,233	\$61,914 25,104 7,874 27,450
Total	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,108,507	\$727,720	\$11,627	\$306,967	\$62,191
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	7.94%	7.94%	7.94%	7.94%	7.94%
Earnings Index	100.00%	100.00%	100.00%	100.00%	100.00%

(Cont'd)

### STATEMENT OF OPERATING INCOME BASED UPON PRO FORMA REVENUES AT NORMALIZED RATES OF RETURN

(Proposed Revenue Levels)

Attachment BRK-4 SCHEDULE 8 PAGE 4 OF 4

	Total	Residential D20	Industrial D30	Commercial D40	Large Volume Interruptible Service D50
OPERATING REVENUES					
Revenues from Gas Sales Miscellaneous Revenues	\$7,599,451 21,391	\$5,314,472 11,831	\$95,405 367	\$2,033,367 8,840	\$156,204 353
Total Operating Revenues	\$7,620,842	\$5,326,303	\$95,772	\$2,042,207	\$156,557
Operating Expenses					
Operation and Maintenance Depreciation and Amortization Expense Taxes Other Than Income Taxes Large Volume Interruptible Service Discount	\$5,829,356 506,642 148,887 27,450	\$4,241,086 343,027 98,974	\$70,148 5,738 1,806	\$1,456,206 132,771 40,233	\$61,914 25,104 7,874 27,450
Total	6,512,335	4,683,087	77,692	1,629,210	122,342
Net Operating Income	\$1,108,507	\$643,216	\$18,080	\$412,997	\$34,215
Total HISTORICAL Rate Base	\$13,961,043	\$9,165,257	\$146,440	\$3,866,088	\$783,256
Rate of Return	7.94%	7.02%	12.35%	10.68%	4.37%
Earnings Index	100.00%	88.39%	155.50%	134.54%	55.02%

### COMPARISON OF PRO FORMA OPERATING REVENUES AND RESULTING DOLLAR SUBSIDY LEVELS AT PRESENT AND PROPOSED RATES

Attachment BRK-4 SCHEDULE 9 PAGE 1 OF 1

	Pro Forma	a Revenues - Pres	ent Rates	Pro Forma Revenues - Proposed Rates							
Data Cabadida	Revenues at Present	Revenues Required for Equalized	Present	Revenues Required for Equalized	Revenues at Proposed	Proposed Calculated	Proposed Contractual		osidy Reduction		
Rate Schedule	Rates	Returns	Subsidy	Returns	Rates	Subsidy	Discount	Amount	Percentage		
Residential	\$4,914,295	\$5,052,787	(\$138,492)	\$5,410,807	\$5,326,303	(\$103,869)	\$19,365	(\$34,623)	25%		
Industrial	91,690	83,627	8,063	89,319	95,772	6,047	406	2,016	25%		
Commercial	1,916,971	1,785,836	131,135	1,936,177	2,042,207	98,351	7,679	32,784	25%		
Large Volume Interruptible Service	153,414	154,115	(701)	184,533	156,557	(526)	(27,450)	(175)	25%		
Total	\$7,076,370	\$7,076,365	\$5	\$7,620,836	\$7,620,839	\$3	\$0	\$2			

#### COMPARISON OF GAS SALES REVENUES AT PRESENT AND PROPOSED RATES

Attachment BRK-4 SCHEDULE 10 PAGE 1 OF 1

	Present Revenue Levels			Prop	osed Revenue Le	Increase or (Decrease)			
Rate Schedule	Margins at Present Rates	Gas Cost Revenue	Revenues at Present Rates	Margins at Proposed Rates	Gas Cost Revenue	Revenues at Proposed Rates	Amount	Rev. %	Margin %
Residential	\$2,204,835	\$2,697,629	\$4,902,464	\$2,616,843	\$2,697,629	\$5,314,472	\$412,008	8.40%	18.69%
Industrial	34,812	56,511	91,323	38,894	56,511	95,405	4,082	4.47%	11.73%
Commercial	838,355	1,069,776	1,908,131	963,591	1,069,776	2,033,367	125,236	6.56%	14.94%
Large Volume Interruptible Service	153,061		153,061	156,204		156,204	3,143	2.05%	2.05%
Total	\$3,231,063	\$3,823,916	\$7,054,979	\$3,775,532	\$3,823,916	\$7,599,448	\$544,469	7.72%	16.85%

#### COMPARISON OF MARGINS AT PRESENT AND PROPOSED RATES

Attachment BRK-4 SCHEDULE 11 PAGE 1 OF 1

Description	Number of Bills	Billing Quantities (therms)	Present Rates (\$/therm)	Pro Forma GCA (\$/therm)	Effective Present Rates (\$/therm)	Margin at Present Rates	Proposed Rates (\$/therm)	Pro Forma Base Cost of Gas (\$/therm)	Proposed Effective Rates (\$/therm)	Margin at Proposed Rates	Increase in Amount	n Margins Percent
Residential: Customer Charge First 120 Therms Next 380 Therms Over 500 Therms	67,846	3,500,706 642,284 6,102	\$11.83 0.3590 0.2245 0.2082	\$0.0000 0.0000 0.0000	\$0.3590 0.2245 0.2082	\$802,618 1,256,753 144,193 1,270	\$14.04 0.4261 0.2664 0.2471	\$0.0000 0.0000 0.0000	\$14.04 0.4261 0.2664 0.2471	\$952,558 1,491,651 171,104 1,508	\$149,940 234,898 26,911 238	18.68% 18.69% 18.66% 18.74%
Total Therms and Margins  Industrial: Customer Charge First 500 Therms Over 500 Therms Total Therms and Margins	107	28,952 65,039 93,991	\$109.18 0.3869 0.1834	\$0.0000 0.0000	\$0.3869 0.1834	\$11,682 11,202 11,928 \$34,812	\$121.98 0.4323 0.2049	\$0.0000 0.0000	\$121.98 0.4323 0.2049	\$13,052 12,516 13,326 \$38,894	\$1,370 1,314 1,398 \$4,082	11.73% 11.73% 11.72% 11.73%
Commercial: Customer Charge First 120 Therms Next 380 Therms Over 500 Therms Total Therms and Margins	5,815	381,804 639,403 1,869,571 2,890,778	\$36.48 0.2940 0.2132 0.2020	\$0.0000 0.0000 0.0000	\$0.2940 0.2132 0.2020	\$212,131 112,250 136,321 377,653 \$838,355	\$41.93 0.3378 0.2450 0.2322	\$0.0000 0.0000 0.0000	\$41.93 0.3378 0.2450 0.2322	\$243,823 128,973 156,654 434,114 \$963,564	\$31,692 16,723 20,333 56,461 \$125,209	14.94% 14.90% 14.92% 14.95%
Large Volume Interruptible Service: Customer Charge All Therms Total Therms and Margins	24	784,297 784,297	\$1,142.34 0.1602	\$0.0000	\$0.1602	\$27,416 125,644 \$153,060	\$1,165.80 0.1635	\$0.0000	\$1,165.80 0.1635	\$27,979 128,233 \$156,212	\$563 2,589 \$3,152	2.05% 2.06% 2.06%
Total Therms and Margin from Rates  Miscellaneous Revenues  Total Margin Including Misc. Revenue	73,792	7,918,158				\$3,231,061 \$21,391 \$3,252,452				\$3,775,491 \$21,391 \$3,796,882	\$544,430 \$0 \$544,430	16.85%

#### REVENUE PROOF AT PROPOSED RATES

Attachment BRK-4 SCHEDULE 12 PAGE 1 OF 1

Description	Number of Bills	Billing Quantities (therms)	Proposed Rates (\$/therm)	Pro Forma Base Cost of Gas (\$/therm)	Proposed Effective Rates (\$/therm)	Margin at Proposed Rates	Misc. Revenues	Total Revenues	Cost-of- Service	(Over)/Under Recovery	(Over)/Under Recovery Percentage
Residential: Customer Charge First 120 Therms	67,846	3,500,706	\$14.04 0.4261	\$0.0000	\$14.04 0.4261	\$952,558 1,491,651					
Next 380 Therms Over 500 Therms		642,284	0.2664 0.2471	0.0000	0.2664 0.2471	171,104 1,508					
Total Therms and Margins		4,149,092				\$2,616,821	\$11,831	\$2,628,652	\$2,628,674	\$22	0.0008%
Industrial: Customer Charge First 500 Therms Over 500 Therms	107	28,952 65,039	\$121.98 0.4323 0.2049	\$0.0000 0.0000	\$121.98 0.4323 0.2049	\$13,052 12,516 13,326					
Total Therms and Margins		93,991				\$38,894	\$367	\$39,261	\$39,261	\$0	0.0000%
Commercial: Customer Charge First 120 Therms Next 380 Therms Over 500 Therms	5,815	381,804 639,403 1,869,571	\$41.93 0.3378 0.2450 0.2322	\$0.0000 0.0000 0.0000	\$41.93 0.3378 0.2450 0.2322	\$243,823 128,973 156,654 434,114					
Total Therms and Margins		2,890,778				\$963,564	\$8,840	\$972,404	\$972,431	\$27	0.0028%
<u>Large Volume Interruptible Service:</u> Customer Charge All Therms	24	784,297	\$1,165.80 0.1635	\$0.0000	\$1,165.80 0.1635	\$27,979 128,233					
Total Therms and Margins		784,297				\$156,212	\$353	\$156,565	\$156,557	(\$8)	-0.0051%
Total Therms and Revenue	73,792	7,918,158				\$3,775,491	\$21,391	\$3,796,882	\$3,796,923	\$41	0.0011%

## TYPICAL BILL COMPARISON RESIDENTIAL - D20

Attachment BRK-4 SCHEDULE 13 PAGE 1 OF 4

Level of Usage (therms)	Current Bill (\$)	Proposed Bill (\$)	Dollar Increase (\$)	Percent Increase (%)	Gas Cost Recovery (\$)	Total Current Bill (\$)	Total Proposed Bill (\$)	Percent Increase (%)
0	\$11.83	\$14.04	\$2.21	18.68%	\$0.00	\$11.83	\$14.04	18.68%
10	15.42	18.30	2.88	18.68%	4.83	20.25	23.13	14.22%
20	19.01	22.56	3.55	18.67%	9.66	28.67	32.22	12.38%
30	22.60	26.82	4.22	18.67%	14.49	37.09	41.31	11.38%
40	26.19	31.08	4.89	18.67%	19.32	45.51	50.40	10.75%
50	29.78	35.35	5.57	18.70%	24.15	53.93	59.50	10.33%
60	33.37	39.61	6.24	18.70%	28.97	62.34	68.58	10.01%
70	36.96	43.87	6.91	18.70%	33.80	70.76	77.67	9.76%
80	40.55	48.13	7.58	18.69%	38.63	79.18	86.76	9.57%
90	44.14	52.39	8.25	18.69%	43.46	87.60	95.85	9.42%
100	47.73	56.65	8.92	18.69%	48.29	96.02	104.94	9.29%
125	56.03	66.50	10.47	18.69%	60.36	116.39	126.86	9.00%
150	61.65	73.16	11.51	18.67%	72.44	134.09	145.60	8.58%
175	67.26	79.82	12.56	18.67%	84.51	151.77	164.33	8.28%
200	72.87	86.48	13.61	18.68%	96.58	169.45	183.06	8.03%
250	84.10	99.80	15.70	18.67%	120.73	204.83	220.53	7.67%
300	95.32	113.12	17.80	18.67%	144.87	240.19	257.99	7.41%
400	117.77	139.76	21.99	18.67%	193.16	310.93	332.92	7.07%
500	140.22	166.40	26.18	18.67%	241.45	381.67	407.85	6.86%

(Cont'd)

## TYPICAL BILL COMPARISON INDUSTRIAL - D30

Attachment BRK-4 SCHEDULE 13 PAGE 2 OF 4

Level of Usage (therms)	Current Bill (\$)	Proposed Bill (\$)	Dollar Increase (\$)	Percent Increase (%)	Gas Cost Recovery (\$)	Total Current Bill (\$)	Total Proposed Bill (\$)	Percent Increase (%)
0	\$109.18	\$121.98	\$12.80	11.72%	\$0.00	\$109.18	\$121.98	11.72%
100	147.87	165.21	17.34	11.73%	48.29	196.16	213.50	8.84%
200	186.56	208.44	21.88	11.73%	96.58	283.14	305.02	7.73%
300	225.25	251.67	26.42	11.73%	144.87	370.12	396.54	7.14%
400	263.94	294.90	30.96	11.73%	193.16	457.10	488.06	6.77%
500	302.63	338.13	35.50	11.73%	241.45	544.08	579.58	6.52%
600	320.97	358.62	37.65	11.73%	289.74	610.71	648.36	6.16%
700	339.31	379.11	39.80	11.73%	338.03	677.34	717.14	5.88%
800	357.65	399.60	41.95	11.73%	386.32	743.97	785.92	5.64%
900	375.99	420.09	44.10	11.73%	434.61	810.60	854.70	5.44%
1,000	394.33	440.58	46.25	11.73%	482.90	877.23	923.48	5.27%
1,500	486.03	543.03	57.00	11.73%	724.35	1,210.38	1,267.38	4.71%
2,000	577.73	645.48	67.75	11.73%	965.80	1,543.53	1,611.28	4.39%
2,500	669.43	747.93	78.50	11.73%	1,207.25	1,876.68	1,955.18	4.18%
3,000	761.13	850.38	89.25	11.73%	1,448.70	2,209.83	2,299.08	4.04%
3,500	852.83	952.83	100.00	11.73%	1,690.15	2,542.98	2,642.98	3.93%
4,000	944.53	1,055.28	110.75	11.73%	1,931.60	2,876.13	2,986.88	3.85%
4,500	1,036.23	1,157.73	121.50	11.73%	2,173.05	3,209.28	3,330.78	3.79%
5,000	1,127.93	1,260.18	132.25	11.73%	2,414.50	3,542.43	3,674.68	3.73%

(Cont'd)

## TYPICAL BILL COMPARISON COMMERCIAL - D40

Attachment BRK-4 SCHEDULE 13 PAGE 3 OF 4

Level of Usage (therms)	Current Bill (\$)	Proposed Bill (\$)	Dollar Increase (\$)	Percent Increase (%)	Gas Cost Recovery (\$)	Total Current Bill (\$)	Total Proposed Bill (\$)	Percent Increase (%)
0	\$36.48	\$41.93	\$5.45	14.94%	\$0.00	\$36.48	\$41.93	14.94%
25	43.83	50.38	6.55	14.94%	12.07	55.90	62.45	11.72%
50	51.18	58.82	7.64	14.93%	24.15	75.33	82.97	10.14%
100	65.88	75.71	9.83	14.92%	48.29	114.17	124.00	8.61%
150	78.16	89.82	11.66	14.92%	72.44	150.60	162.26	7.74%
200	88.82	102.07	13.25	14.92%	96.58	185.40	198.65	7.15%
250	99.48	114.32	14.84	14.92%	120.73	220.21	235.05	6.74%
300	110.14	126.57	16.43	14.92%	144.87	255.01	271.44	6.44%
350	120.80	138.82	18.02	14.92%	169.02	289.82	307.84	6.22%
400	131.46	151.07	19.61	14.92%	193.16	324.62	344.23	6.04%
450	142.12	163.32	21.20	14.92%	217.31	359.43	380.63	5.90%
500	152.78	175.57	22.79	14.92%	241.45	394.23	417.02	5.78%
600	172.98	198.79	25.81	14.92%	289.74	462.72	488.53	5.58%
700	193.18	222.01	28.83	14.92%	338.03	531.21	560.04	5.43%
800	213.38	245.23	31.85	14.93%	386.32	599.70	631.55	5.31%
900	233.58	268.45	34.87	14.93%	434.61	668.19	703.06	5.22%
1,000	253.78	291.67	37.89	14.93%	482.90	736.68	774.57	5.14%
1,500	354.78	407.77	52.99	14.94%	724.35	1,079.13	1,132.12	4.91%
2,000	455.78	523.87	68.09	14.94%	965.80	1,421.58	1,489.67	4.79%

(Cont'd)

### TYPICAL BILL COMPARISON LARGE VOLUME INTERUPTIBLE SERVICE - D50

Attachment BRK-4 SCHEDULE 13 PAGE 4 OF 4

			5.11	Б.,	0 0 1	Total	Total	5 .
Level of	Current	Proposed	Dollar	Percent	Gas Cost	Current	Proposed	Percent
Usage	Bill	Bill	Increase	Increase	Recovery	Bill	Bill	Increase
(therms)	(\$)	(\$)	(\$)	(%)	(\$)	(\$)	(\$)	(%)
0	\$1,142.34	\$1,165.80	\$23.46	2.05%	\$0.00	\$1,142.34	\$1,165.80	2.05%
1,000	1,302.54	1,329.30	26.76	2.05%	482.90	1,785.44	1,812.20	1.50%
5,000	1,943.34	1,983.30	39.96	2.06%	2,414.50	4,357.84	4,397.80	0.92%
10,000	2,744.34	2,800.80	56.46	2.06%	4,829.00	7,573.34	7,629.80	0.75%
15,000	3,545.34	3,618.30	72.96	2.06%	7,243.50	10,788.84	10,861.80	0.68%
20,000	4,346.34	4,435.80	89.46	2.06%	9,658.00	14,004.34	14,093.80	0.64%
25,000	5,147.34	5,253.30	105.96	2.06%	12,072.50	17,219.84	17,325.80	0.62%
30,000	5,948.34	6,070.80	122.46	2.06%	14,487.00	20,435.34	20,557.80	0.60%
35,000	6,749.34	6,888.30	138.96	2.06%	16,901.50	23,650.84	23,789.80	0.59%
40,000	7,550.34	7,705.80	155.46	2.06%	19,316.00	26,866.34	27,021.80	0.58%
45,000	8,351.34	8,523.30	171.96	2.06%	21,730.50	30,081.84	30,253.80	0.57%
50,000	9,152.34	9,340.80	188.46	2.06%	24,145.00	33,297.34	33,485.80	0.57%
60,000	10,754.34	10,975.80	221.46	2.06%	28,974.00	39,728.34	39,949.80	0.56%
70,000	12,356.34	12,610.80	254.46	2.06%	33,803.00	46,159.34	46,413.80	0.55%
80,000	13,958.34	14,245.80	287.46	2.06%	38,632.00	52,590.34	52,877.80	0.55%
90,000	15,560.34	15,880.80	320.46	2.06%	43,461.00	59,021.34	59,341.80	0.54%
100,000	17,162.34	17,515.80	353.46	2.06%	48,290.00	65,452.34	65,805.80	0.54%
110,000	18,764.34	19,150.80	386.46	2.06%	53,119.00	71,883.34	72,269.80	0.54%
120,000	20,366.34	20,785.80	419.46	2.06%	57,948.00	78,314.34	78,733.80	0.54%

wp 470-S1

Westfield Gas, LLC Depreciation on Utility Plant in Service 170 IAC 1-5-8 (2)

В С D Ε F G Н Annual Annual Depreciation Depreciation Test Year Pro Forma Balance December 31, 2021 Test Year Depr Rate Pro Forma Depr Rate Depr Rate Plant in Service Accum Depr Line Depr Rate (Col C \* Col E) (Col D \* Col E) Citizens Gas of Westfield Distribution Land & Land Rights 46,086 1 006-374-0 2 006-375-0 Structures & Improvements 1.45% 2.34% 39,942 (3.852)579 935 006-376-0 2.94% 1.96% 361,973 241,315 3 Mains 12,311,991 (3,724,346)4 006-378-0 Measuring & Regulating Equip.-Genera 3.31% 2.14% 17.912 (9,490)593 383 5 006-379-0 Measuring & Regulating Equip.-GCCS 3.30% 3.27% 92.124 (27.204)3.040 3.012 6 006-380-0 Service 3.98% 2.77% 4,281,001 (1,687,229)170,384 118,584 7 006-381-0 Meters 3.74% 2.70% 791.240 (416, 155)29,592 21,363 8 006-382-0 Meter Installations 3.40% 1.74% 16,147 549 281 (14,069)9 006-383-0 House Regulators 3.95% 2.14% 86,663 (65,413)3,423 1,855 10 006-384-0 House Regulator Installations (589)11 006-385-0 Ind Meas & Reg Station Equip 3.55% 1.04% 32,553 339 (33,356)1,156 Transmission 065-366-0 1.87% Structures & Improvements 1.87% 83,079 12 (129)1,554 1,554 13 065-367-0 Mains 2.12% 2.12% 277,307 5,879 5,879 (1,470)14 065-369-0 Measuring & Regulating Equipment 2.56% 2.56% 717,630 (1,531)18,371 18,371 15 **Total** 18,793,675 (5,984,833) 597,093 413,871 2.20% CSS 16 007-389-0 Land 1,581,974 Structures & Improvements 2.73% 1.400.085 17 007-390-0 2.73% 51.285.161 (31.440.673)1.400.085 (2,353,930)18 007-391-1 Office Furniture 2.69% 2.69% 3,735,376 100,482 100,482 19 007-391-2 Office Machines 6.50% 6.50% 2.388.128 (750.420)155.228 155.228 007-391-3 Computer Equipment 20 21.22% 21.22% 6,069,126 (418,827)1,287,869 1,287,869 21 007-391-4 Software 8.84% 8.84% 29,564,384 (25,489,840)2,613,492 2,613,492 22 007-391-C Software - CIS 8.84% 8.84% 24,130,620 2,133,147 2,133,147 (3,180,324)23 007-392-0 Transportation Equipment 10.49% 10.49% 75,108 (46,398)7,879 7,879 24 007-394-1 **Tool Equipment** 5.03% 5.03% 19,606 (6.948)986 986 25 007-394-2 Garage Equipment 5.03% 5.03% 21,259 (4,396)1,069 1,069 26 007-397-0 Communication Equipment 6.56% 6.56% 3,980,926 (2,079,346)261,149 261,149 27 007-398-0 Other Equipment 5.09% 709,948 (245,744)36,136 36,136 5.09% 28 Total 123,561,616 7,997,521 (66,016,845) 7,997,521

#### **AFFIRMATION**

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

Brien R. Krieger

Utility Analyst II

Indiana Office of

Utility Consumer Counselor

Cause No. 45761

Citizens Gas of Westfield, LLC

December 2 2022

#### **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 December 2, 2022.

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Afry M Rul

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