

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE BOARD OF DIRECTORS FOR )  
UTILITIES OF THE DEPARTMENT OF PUBLIC )  
UTILITIES OF THE CITY OF INDIANAPOLIS, AS )  
SUCCESSOR TRUSTEE OF A PUBLIC ) CAUSE NO. 37399 GCA-148  
CHARITABLE TRUST, FOR APPROVAL OF GAS )  
COST ADJUSTMENTS TO BE APPLICABLE IN )  
THE MONTHS OF DECEMBER 2020, JANUARY )  
AND FEBRUARY 2021 )

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S

PUBLIC'S EXHIBIT NO. 1 – TESTIMONY OF OUCC WITNESS  
HEATHER R. POOLE

PUBLIC'S EXHIBIT NO. 2 – GCA-148 FACTOR CALCULATIONS

PUBLIC'S EXHIBIT NO. 3 – GCA-148 STATISTICAL CALCULATIONS

With the current requirement that all staff work from home, signatures for affirmations are not available at this time.

October 30, 2020

Respectfully submitted,



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Scott C. Franson  
Attorney No. 27839-49  
Deputy Consumer Counselor

**PUBLIC'S EXHIBIT NO. 1**  
**TESTIMONY OF OUCC WITNESS HEATHER R. POOLE**

**CAUSE NO. 37399 GCA 148**  
**CITIZENS GAS**

**THE BOARD OF DIRECTORS FOR UTILITIES OF THE DEPARTMENT OF  
PUBLIC UTILITIES OF THE CITY OF INDIANAPOLIS, AS SUCCESSOR  
TRUSTEE OF A PUBLIC CHARITABLE TRUST, D/B/A CITIZENS GAS  
CAUSE NO. 37399 GCA 148  
TESTIMONY OF OUCC WITNESS HEATHER R. POOLE**

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

2   A:    My name is Heather R. Poole, and my business address is 115 West Washington  
3         Street, Suite 1500 South, Indianapolis, IN 46204.

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

5   A:    I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as the  
6         Assistant Director of the Natural Gas Division. I have worked as a member of the  
7         OUCC's Natural Gas Division since December 2010.

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

10  A:    Yes. I have testified in Gas Cost Adjustment ("GCA") cases, rate cases, TDSIC  
11         tracker cases, 7-Year Plan cases, tariff, gas demand side management, and special  
12         contract cases involving gas and water utilities. I also provided extensive testimony in  
13         the Commission's investigation into the existing GCA procedures and schedules.

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

15  A:    The purpose of my testimony is to confirm the accuracy of calculations used to  
16         establish the proposed GCA factors presented in the Board of Directors for Utilities of  
17         the Department of Public Utilities of the City of Indianapolis, as Successor Trustee of  
18         a Public Charitable Trust, d/b/a Citizens Gas' ("Citizens Gas" or "Petitioner") Petition  
19         for Approval of its proposed Gas Cost Adjustment in Cause No. 37399 GCA 148, to  
20         be applicable in the billing cycles of December 2020 through February 2021.

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

2 A: I reviewed the Petition, Direct Testimony, Schedules, Revised Schedules, Exhibits and  
3 Workpapers submitted by Petitioner. I reviewed Citizens Gas' GCA filings for the past  
4 year, and prepared Public's Exhibit Nos. 2 and 3. I also performed a review of  
5 Petitioner's books and records.

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

7 A: Public's Exhibit No. 2 (GCA 148 Factor Calculations) presents numerical information  
8 provided and used by Petitioner in calculating the proposed GCA 148 monthly factors.  
9 This Exhibit consists of the following schedules:

- 10 • Schedule 1 – Determination of Gas Cost Adjustment Charge for December 2020;
- 11 • Schedule 2 – Determination of Gas Cost Adjustment Charge for January 2021;
- 12 • Schedule 3 – Determination of Gas Cost Adjustment Charge for February 2021;
- 13 • Schedule 4 – Gas Cost Variance and Balancing Demand Variance; and
- 14 • Schedule 5 – Calculation of Actual Gas Cost Variance and Calculation of  
15 Balancing Demand Variance.

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

17 A: Public's Exhibit No. 3 (GCA 148 Statistical Calculations) presents certain data used in  
18 calculating Citizens Gas' GCA 148 proposed factors and the results of performing  
19 certain statistical calculations on that data. The data for these calculations was  
20 provided by Citizens Gas in this and prior GCA petitions and will be verified by the  
21 OUCC during Petitioner's next annual review. The calculations reflected in Public's  
22 Exhibit No. 3 address the following areas:

- 23 • General information;
- 24 • Estimation information;

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

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

A: No. Citizens Gas' GCA 148 quarterly filing falls between annual reviews; as such, the OUCC has not performed an examination, review, or compilation procedures on this data. Since those additional procedures have not yet been performed, it is important that Petitioner's GCA rates only be finalized after gas costs have been reconciled and the books and records have been examined in accordance with Ind. Code § 8-1-2-42(g)(2). The OUCC's next scheduled examination, review, or compilation of data for Citizens Gas' GCAs 147-150 will be performed in GCA 150.

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

A: Yes. Citizens' scheduled annual review for GCA's 143-146 was to be conducted in April 2020, during Citizens' GCA 146 review. However, due to COVID-19, the OUCC performed the annual review for GCA's 143-146 in October 2020, during Citizens' GCA 148 review. The annual review allowed the OUCC to examine workpapers to verify the accuracy of information Petitioner provided to the OUCC and used to calculate the proposed GCA factors. The OUCC also verified the Commission-approved GCA factors were billed to customers for the reconciliation period examined. The reconciliation periods examined encompass March 2019 to February 2020. The corresponding GCAs for these months are as follows: March, April and May (2019) for GCA 143; June, July and August (2019) for GCA 144;

1 September, October and November (2019) for GCA 145; and December (2019),  
2 January and February (2020) for GCA 146.

3 **Q: Were there any discrepancies in Citizens Gas' original exhibits for GCA 148, as**  
4 **filed on October 2, 2020?**

5 A: No, there were not.

6 **Q: Do you agree with Citizens Gas' calculation of the GCA 148 factors, as revised on**  
7 **October 22, 2020?**

8 A: Yes. Citizens Gas' changes in the revised exhibits reflect the most recent market price  
9 of gas. Based on information provided by Petitioner in the Revised Schedules filed on  
10 October 22, 2020, the OUCC found nothing to indicate Citizens Gas has not correctly  
11 calculated the proposed GCA 148 factors in accordance with all applicable  
12 requirements.

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

14 A: Yes.

**PUBLIC'S EXHIBIT NO. 2**  
**GCA 148 FACTOR CALCULATIONS**

**CAUSE NO. 37399 GCA 148**  
**CITIZENS GAS**

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**December 2020**

Line No.		Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	Commodity Costs	\$39,184	\$8,500,483	\$126,824	\$2,851,481	\$0
2	Add: Gas Cost Variance	(5,095)	(724,418)	(8,789)	(377,500)	0
3	Less: Refunds	0	0	0	0	0
4	Non-Demand Cost to be Recovered through GCA	\$34,089	\$7,776,065	\$118,035	\$2,473,981	\$0
5	Sales Subject to GCA (Dth)	17,096	3,708,819	55,332	1,244,118	0
6	Non-Demand Cost per Unit	\$1.994	\$2.097	\$2.133	\$1.989	\$0.000
7	Add: Retail Demand Cost Per Unit	0.660	0.680	0.562	0.704	0.000
8	Add: Balancing Demand Cost Variance per unit of throughput (D1 & D2 Only)	(0.006)	(0.004)	0.000	0.000	0.000
9	Add: Annual Balancing Demand Cost per Unit (D1 & D2 Only)	0.006	0.006	0.000	0.000	0.000
10	Net Write-Off Recovery Cost per Dth	0.040	0.039	0.007	0.011	0.000
11	Add: PEPL Unnominated Quantities Retail Cost Per Unit	0.126	0.137	0.040	0.144	0.000
12	Add: PEPL Balancing Costs Rates D1 & D2 Only	0.011	0.011	0.000	0.000	0.000
13	Total Cost Per Unit	\$2.831	\$2.966	\$2.742	\$2.848	\$0.000
14	GCA Factor Modified for Utility Receipts Tax	\$2.871	\$3.008	\$2.781	\$2.888	\$0.000



**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**December 2020**

<u>Line No.</u>		<u>Rate D3/D7</u>	<u>Rate D4</u>	<u>Rate D5</u>	<u>Rate D9</u>
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.006	\$0.006	\$0.006	\$0.006
2	PEPL Balancing Demand Charge Per Unit of Throughput	0.0110	0.0110	0.0110	0.0110
3	Total Balancing Demand Cost Variance per unit of Throughput	(0.0073)	(0.0050)	0.0028	0.2250
4	Total Balancing Demand Charge Per Unit of Throughput	0.0097	0.0120	0.0198	0.2420
5	Total Balancing Demand Change Modified For Indiana Utilities Receipts Tax	\$0.010	\$0.012	\$0.020	\$0.245
<u>Calculation of Basic Balancing Charge per Unit</u>					
6	Basic Balancing Charge	0.0005	0.0006	0.0010	0.0121
7	Total Basic Balancing Charge per Unit	0.0005	0.0006	0.0010	0.0121
8	Basic Balancing Charge Modified for Utilities Receipts Tax	\$0.001	\$0.001	\$0.001	\$0.012

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**December 2020**

<u>Line No.</u>		
1	PEPL retail demand costs	\$164,877
2	Annual retail demand costs	<u>906,913</u>
3	Total retail demand costs	\$1,071,790
4	Estimated annual retail sales (Dths)	<u>1,299,450</u>
5	Back-up supply capacity charge per unit	<u>\$0.825</u>
6	Back-up supply capacity charge modified for URT	<u><u>\$0.837</u></u>
7	PEPL monthly variable costs	\$16,959
8	Total monthly non-demand costs	<u>2,978,305</u>
9	Total retail non-demand costs	\$2,995,264
10	Estimated monthly retail sales (Dths)	<u>1,299,450</u>
11	Back-up supply commodity charge per unit	<u>\$2.305</u>
12	Back-up supply commodity charge modified for URT	<u><u>\$2.338</u></u>
13	Total Back-up Gas Supply Charge	<u><u>\$3.175</u></u>

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**January 2021**

Line No.		Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	Commodity Costs	\$46,049	\$9,470,071	\$87,675	\$3,716,642	\$0
2	Add: Gas Cost Variance	(5,903)	(795,604)	(5,990)	(485,061)	0
3	Less: Refunds	0	0	0	0	0
4	Non-Demand Cost to be Recovered through GCA	\$40,146	\$8,674,467	\$81,685	\$3,231,581	\$0
5	Sales Subject to GCA (Dth)	19,809	4,073,269	37,712	1,598,601	0
6	Non-Demand Cost per Unit	\$2.027	\$2.130	\$2.166	\$2.022	\$0.000
7	Add: Retail Demand Cost Per Unit	0.611	0.664	0.885	0.588	0.000
8	Add: Balancing Demand Cost Variance per unit of throughput (D1 & D2 Only)	(0.006)	(0.004)	0.000	0.000	0.000
9	Add: Annual Balancing Demand Cost per Unit (D1 & D2 Only)	0.006	0.006	0.000	0.000	0.000
10	Net Write-Off Recovery Cost per Dth	0.039	0.041	0.012	0.009	0.000
11	Add: PEPL Unnominated Quantities Retail Cost Per Unit	0.112	0.127	0.059	0.115	0.000
12	Add: PEPL Balancing Costs Rates D1 & D2 Only	0.010	0.010	0.000	0.000	0.000
13	Total Cost Per Unit	\$2.799	\$2.974	\$3.122	\$2.734	\$0.000
14	GCA Factor Modified for Utility Receipts Tax	\$2.839	\$3.016	\$3.166	\$2.773	\$0.000

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**January 2021**

<u>Line No.</u>		<u>Rate D3/D7</u>	<u>Rate D4</u>	<u>Rate D5</u>	<u>Rate D9</u>
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.006	\$0.006	\$0.006	\$0.006
2	ADS 2 Balancing Demand Charge Per Unit of Throughput	0.0100	0.0100	0.0100	0.0100
3	Total Balancing Demand Cost Variance per unit of Throughput	(0.0073)	(0.0050)	0.0028	0.2251
4	Total Balancing Demand Charge Per Unit of Throughput	0.0087	0.0110	0.0188	0.2411
5	Total Balancing Demand Change Modified For Indiana Utilities Receipts Tax	\$0.009	\$0.011	\$0.019	\$0.245
<u>Calculation of Basic Balancing Charge per Unit</u>					
6	Basic Balancing Charge	0.0004	0.0006	0.0009	0.0121
7	Total Basic Balancing Charge per Unit	0.0004	0.0006	0.0009	0.0121
8	Basic Balancing Charge Modified for Utilities Receipts Tax	\$0.000	\$0.001	\$0.001	\$0.012

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**January 2021**

<u>Line No.</u>		
1	PEPL retail demand costs	\$164,877
2	Annual retail demand costs	<u>973,095</u>
3	Total retail demand costs	\$1,137,972
4	Estimated annual retail sales (Dths)	<u>1,636,313</u>
5	Back-up supply capacity charge per unit	<u>\$0.695</u>
6	Back-up supply capacity charge modified for URT	<u><u>\$0.705</u></u>
7	PEPL monthly variable costs	\$21,198
8	Total monthly non-demand costs	<u>3,804,317</u>
9	Total retail non-demand costs	\$3,825,515
10	Estimated monthly retail sales (Dths)	<u>1,636,313</u>
11	Back-up supply commodity charge per unit	<u>\$2.338</u>
12	Back-up supply commodity charge modified for URT	<u><u>\$2.371</u></u>
13	Total Back-up Gas Supply Charge	<u><u>\$3.076</u></u>

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**February 2021**

Line No.		Rate D1	Rate D2	Rate D3/D7	Rate D4	Rate D5
1	Commodity Costs	\$43,393	\$9,645,933	\$62,840	\$3,724,043	\$0
2	Add: Gas Cost Variance	(5,420)	(789,652)	(4,184)	(473,596)	0
3	Less: Refunds	0	0	0	0	0
4	Non-Demand Cost to be Recovered through GCA	\$37,973	\$8,856,281	\$58,656	\$3,250,447	\$0
5	Sales Subject to GCA (Dth)	18,188	4,042,802	26,336	1,560,817	0
6	Non-Demand Cost per Unit	\$2.088	\$2.191	\$2.227	\$2.083	\$0.000
7	Add: Retail Demand Cost Per Unit	0.605	0.609	1.153	0.548	0.000
8	Add: Balancing Demand Cost Variance per unit of throughput (D1 & D2 Only)	(0.006)	(0.004)	0.000	0.000	0.000
9	Add: Annual Balancing Demand Cost per Unit (D1 & D2 Only)	0.005	0.005	0.000	0.000	0.000
10	Net Write-Off Recovery Cost per Dth	0.041	0.040	0.018	0.010	0.000
11	Add: PEPL Unnominated Quantities Retail Cost Per Unit	0.115	0.122	0.081	0.111	0.000
12	Add: PEPL Balancing Costs Rates D1 & D2 Only	0.009	0.009	0.000	0.000	0.000
13	Total Cost Per Unit	\$2.857	\$2.972	\$3.479	\$2.752	\$0.000
14	GCA Factor Modified for Utility Receipts Tax	\$2.898	\$3.014	\$3.528	\$2.791	\$0.000

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**February 2021**

<u>Line No.</u>		<u>Rate D3/D7</u>	<u>Rate D4</u>	<u>Rate D5</u>	<u>Rate D9</u>
<u>Calculation of Balancing Demand Charge per Unit</u>					
1	Monthly Balancing Demand Charge Per Unit of Throughput	\$0.005	\$0.005	\$0.005	\$0.005
2	PEPL Balancing Demand Charge Per Unit of Throughput	0.0090	0.0090	0.0090	0.0090
3	Total Balancing Demand Cost Variance per unit of Throughput	(0.0073)	(0.0050)	0.0028	0.2250
4	Total Balancing Demand Charge Per Unit of Throughput	0.0067	0.0090	0.0168	0.2390
5	Total Balancing Demand Change Modified For Indiana Utilities Receipts Tax	\$0.007	\$0.009	\$0.017	\$0.242
<u>Calculation of Basic Balancing Charge per Unit</u>					
6	Basic Balancing Charge	0.0003	0.0005	0.0008	0.0120
7	Total Basic Balancing Charge per Unit	0.0003	0.0005	0.0008	0.0120
8	Basic Balancing Charge Modified for Utilities Reciepts Tax	\$0.000	\$0.001	\$0.001	\$0.012

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**DETERMINATION OF GAS COST ADJUSTMENT CHARGE**  
**February 2021**

<u>Line No.</u>		
1	PEPL retail demand costs	\$155,396
2	Annual retail demand costs	<u>885,113</u>
3	Total retail demand costs	\$1,040,509
4	Estimated annual retail sales (Dths)	<u>1,587,153</u>
5	Back-up supply capacity charge per unit	<u>\$0.656</u>
6	Back-up supply capacity charge modified for URT	<u><u>\$0.665</u></u>
7	PEPL monthly variable costs	\$21,198
8	Total monthly non-demand costs	<u>3,786,883</u>
9	Total retail non-demand costs	\$3,808,081
10	Estimated monthly retail sales (Dths)	<u>1,587,153</u>
11	Back-up supply commodity charge per unit	<u>\$2.399</u>
12	Back-up supply commodity charge modified for URT	<u><u>\$2.433</u></u>
13	Total Back-up Gas Supply Charge	<u><u>\$3.098</u></u>



**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**GAS COST VARIANCE**

Line No.	Allocation of Variance		Variance from Carry Forward			Variance for
	June through August		GCA 145	GCA 146	GCA 147	this Application
	Reconciliation (GCA 148)					
		Col. A	Col. D	Col. E	Col. F	Col. G
1	Rate No. D1	(\$3,755)	(\$2,574)	(\$6,377)	(\$3,712)	(\$16,418)
2	Rate No. D2	(348,217)	(525,422)	(1,191,612)	(244,423)	(2,309,674)
3	Rate No. D3/D7	(10,261)	(9,078)	7,167	(6,791)	(18,963)
4	Rate No. D4	(224,147)	(434,226)	(529,402)	(148,382)	(1,336,157)
5	Rate No. D5	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
6	Total	<u>(\$586,380)</u>	<u>(\$971,300)</u>	<u>(\$1,720,224)</u>	<u>(\$403,308)</u>	<u>(\$3,681,212)</u>

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**BALANCING DEMAND VARIANCE**

Line No.	Allocation of Variance					Variance for this Application Col. G
	June through August Reconciliation (GCA 148) Col. A	Variance from Carry Forward				
		GCA 145 Col. C	GCA 146 Col. D	GCA 147 Col. E		
1	Rate No. D1	(\$114)	(\$185)	(\$2)	(\$9)	(\$310)
2	Rate No. D2	(\$11,256)	(\$29,770)	(\$292)	(\$5,333)	(\$46,651)
3	Rate No. D3/D7	(\$3,127)	(\$3,261)	\$320	\$30	(\$6,038)
4	Rate No. D4	(\$10,642)	(\$19,392)	(\$2,598)	(\$2,527)	(\$35,159)
5	Rate No. D5	(\$773)	(\$781)	\$2,278	\$1,863	\$2,587
6	Rate No. D9	<u>\$4,361</u>	<u>\$4,240</u>	<u>\$2,498</u>	<u>\$4,652</u>	<u>\$15,751</u>
7	Total	<u>(\$21,551)</u>	<u>(\$49,149)</u>	<u>\$2,204</u>	<u>(\$1,324)</u>	<u>(\$69,820)</u>

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**CALCULATION OF ACTUAL GAS COST VARIANCE**

Line No.		Jun-20	Jul-20	Aug-20	Total
		Col. A	Col. B	Col. C	Col. D
1	Cost of Gas to be Recovered through GCA	\$1,279,703	\$1,314,764	\$1,575,047	\$4,169,514
2	Actual Cost of Gas Billed Excluding Gross/Utility Receipts Tax	\$1,875,374	\$1,582,094	\$1,608,400	\$5,065,868
3	Net Write-Off Recovered	21,232	17,812	17,670	56,714
4	Dollar Amount of Gas Cost Variance From Cause No. 37399, GCA 146	(81,182)	(74,275)	(74,364)	(229,821)
5	Dollar Amount of Refund from From Cause No. 37399, GCA 146	0	0	0	0
6	Gas Cost Charge Revenues to be Reconciled with Cost of Gas Incurred	\$1,935,324	\$1,638,557	\$1,665,094	\$5,238,975
7	Gas Cost Variance	(\$655,621)	(\$323,793)	(\$90,047)	(\$1,069,461)
8	Annual Unaccounted for (Over)/Underrecovery				0
9	Net Write Off Gas Cost Variance				(10,849)
10	Total Gas Cost Variance				<u>(\$1,080,310) (1)</u>
11	Variance Allocated to GCA 148				(\$586,380)
12	Variance Allocated to GCA 149				(280,326)
13	Variance Allocated to GCA 150				(65,806)
14	Variance Allocated to GCA 151				<u>(147,830)</u>
15	Total Variance Allocation				<u>(\$1,080,342) (1)</u>

(1) The difference in the total gas cost variance between line 10 and line 15 is the stranded variance to Rate D5 in the amount of \$32. Per the IURC order in GCA 128, potential recovery of the rate D5 variance shall be addressed in the utility's next base rate case.

**CITIZENS GAS**  
**CAUSE NO. 37399 GCA 148**  
**CALCULATION OF ACTUAL BALANCING DEMAND VARIANCE**

<u>Line No.</u>		<u>Jun-20</u> Col. A	<u>Jul-20</u> Col. B	<u>Aug-20</u> Col. C	<u>Total</u> Col. D
1	Balancing Demand Cost of Gas to be Recovered through GCA	\$52,174	\$53,483	\$55,406	\$161,063
2	Actual Balancing Demand Cost Billed Excluding Gross/Utility Receipts Tax	\$67,579	\$67,147	\$67,099	\$201,825
3	Dollar Amount of Balancing Demand Cost Variance From Cause No. 37399, GCA 146	(1,680)	(1,453)	(1,446)	(4,579)
4	Dollar Amount of Balancing Demand Cost Variance From Cause No. 37399, GCA 146	4,194	4,263	4,265	12,722
5	Balancing Demand Cost recovered to be Reconciled with actual Balancing Demand Cost Incurred	65,065	64,337	64,280	193,682
6	Gas Cost Variance	(\$12,891)	(\$10,854)	(\$8,874)	(\$32,619)
7	Variance Allocated to GCA 148				(\$21,551)
8	Variance Allocated to GCA 149				(7,815)
9	Variance Allocated to GCA 150				298
10	Variance Allocated to GCA 151				(3,551)
11	Total Variance Allocation				(\$32,619)

**PUBLIC'S EXHIBIT NO. 3  
GCA 148 STATISTICAL CALCULATIONS**

**CAUSE NO. 37399 GCA 148  
CITIZENS GAS**

**GENERAL INFORMATION:**

<b>Application Filed:</b>	<b>October 2, 2020</b>
<b>Update Filed:</b>	<b>October 22, 2020</b>
<b>Hearing Date:</b>	<b>November 10, 2020</b>
<b>Estimation Months:</b>	<b>December 2020 through February 2021</b>
<b>Reconciliation Months:</b>	<b>June through August 2020</b>
<b>Pipeline Transporters:</b>	<b>Panhandle Eastern Pipeline Company, LP Texas Gas Transmission, LLC Heartland Gas Pipeline, LLC Rockies Express Pipeline</b>

**ESTIMATION INFORMATION:**

<u>December 2020</u>	Volumes in Dth	Commodity Cost per Dth	Percent of Total
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,393,596	\$2.8435	27.28%
Unnominated Seasonal Gas Purchases	1,200,000	\$2.5693	23.49%
Boil Off/Peaking Purchases	42,263	\$3.1490	0.83%
Storage Withdraw - (Net)	2,472,901	\$1.7356	48.41%
Total Purchases and Net Withdrawals	5,108,760	\$2.2453	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	5,108,760	\$2.2453	
 <u>January 2021</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	1,618,723	\$3.0322	27.78%
Unnominated Seasonal Gas Purchases	1,200,000	\$2.5693	20.59%
Boil Off/Peaking Purchases	42,263	\$3.2940	0.73%
Storage Withdraw - (Net)	2,966,126	\$1.7299	50.90%
Total Purchases and Net Withdrawals	5,827,112	\$2.2759	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	5,827,112	\$2.2759	
 <u>February 2021</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	2,137,215	\$3.0918	37.20%
Unnominated Seasonal Gas Purchases	600,000	\$2.5693	10.44%
Boil Off/Peaking Purchases	42,263	\$3.2480	0.74%
Storage Withdraw - (Net)	2,966,126	\$1.7299	51.62%
Total Purchases and Net Withdrawals	5,745,604	\$2.3353	100.00%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	5,745,604	\$2.3353	
 <u>Quarterly Total</u>			
Physically Hedged Purchases	0	\$0.0000	0.00%
Index Purchases	5,149,534	\$3.0059	30.87%
Unnominated Seasonal Gas Purchases	3,000,000	\$2.5693	17.98%
Boil Off/Peaking Purchases	126,789	\$3.2303	0.76%
Storage Withdraw - (Net)	8,405,153	\$1.7316	50.39%
Total Purchases and Net Withdrawals	16,681,476	\$2.2870	100.0%
Unnominated Seasonal Gas Payback	0	\$0.0000	
Storage Gas - Gross Injections	0	\$0.0000	
Net Gas Available	16,681,476	\$2.2870	

**BILL COMPARISONS**  
**PROPOSED VS. CURRENTLY APPROVED GCA FACTORS**

**December 2020**

Applicant's Requested GCA Factor (\$/Dth) - December 2020	\$3.008
Current Commission Approved GCA Factor (GCA 147 - October 2020)	\$3.491
Increase (Decrease)	<u>(\$0.483)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	43.19	45.61	(\$2.42)	-5.31%
10	69.89	74.72	(\$4.83)	-6.46%
15	96.58	103.83	(\$7.25)	-6.98%
20	123.28	132.94	(\$9.66)	-7.27%
25	149.97	162.05	(\$12.08)	-7.45%

**January 2021**

Applicant's Requested GCA Factor (\$/Dth) - January 2021	\$3.016
Current Commission Approved GCA Factor (GCA 147 - October 2020)	\$3.491
Increase (Decrease)	<u>(\$0.475)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	43.23	\$45.61	(\$2.38)	-5.22%
10	69.97	\$74.72	(\$4.75)	-6.36%
15	96.70	\$103.83	(\$7.13)	-6.87%
20	123.44	\$132.94	(\$9.50)	-7.15%
25	150.17	\$162.05	(\$11.88)	-7.33%

**February 2021**

Applicant's Requested GCA Factor (\$/Dth) - February 2021	\$3.014
Current Commission Approved GCA Factor (GCA 147 - October 2020)	\$3.491
Increase (Decrease)	<u>(\$0.477)</u>

Consumption Dth	Bill at Proposed Factor	Bill at Current Factor	Increase (Decrease)	Percent Change
5	43.22	\$45.61	(\$2.39)	-5.24%
10	69.95	\$74.72	(\$4.77)	-6.38%
15	96.67	\$103.83	(\$7.16)	-6.90%
20	123.40	\$132.94	(\$9.54)	-7.18%
25	150.12	\$162.05	(\$11.93)	-7.36%

**BILL COMPARISONS**  
**PROPOSED VS. PRIOR YEAR APPROVED GCA FACTORS**

**December 2020**

Applicant's Requested GCA Factor (\$/Dth) - December 2020	\$3.008
Prior Year Commission Approved GCA Factor (GCA 144 - December 2019)	\$2.931
Increase (Decrease)	<u>\$0.077</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$43.19	42.78	\$0.41	0.96%
10	\$69.89	69.07	\$0.82	1.19%
15	\$96.58	95.35	\$1.23	1.29%
20	\$123.28	121.64	\$1.64	1.35%
25	\$149.97	147.92	\$2.05	1.39%

**January 2021**

Applicant's Requested GCA Factor (\$/Dth) - January 2021	\$3.016
Prior Year Commission Approved GCA Factor (GCA 144 - January 2020)	\$2.939
Increase (Decrease)	<u>\$0.077</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$43.23	42.82	\$0.41	0.96%
10	\$69.97	69.15	\$0.82	1.19%
15	\$96.70	95.47	\$1.23	1.29%
20	\$123.44	121.80	\$1.64	1.35%
25	\$150.17	148.12	\$2.05	1.38%

**February 2021**

Applicant's Requested GCA Factor (\$/Dth) - February 2021	\$3.014
Prior Year Commission Approved GCA Factor (GCA 144 - February 2020)	\$2.720
Increase (Decrease)	<u>\$0.294</u>

Consumption Dth	Bill at Proposed Factor	Bill at Prior Year Factor	Increase (Decrease)	Percent Change
5	\$43.22	41.73	\$1.49	3.57%
10	\$69.95	66.96	\$2.99	4.47%
15	\$96.67	92.19	\$4.48	4.86%
20	\$123.40	117.42	\$5.98	5.09%
25	\$150.12	142.65	\$7.47	5.24%



**ANALYSIS OF PETITIONER'S SCHEDULE 6 VARIANCE CALCULATIONS**

GCA	134	134	135	135	135	136	136	136	137	137	137	138
Month	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
Actual Gas Cost	19,345,297	12,524,050	12,513,014	5,505,155	3,998,775	2,646,023	2,663,301	2,658,339	2,896,295	5,024,317	10,776,355	20,166,550
Variance	465,797	318,493	(473,724)	644,463	(120,066)	(148,411)	720,980	1,590,172	616,874	(213,978)	(774,263)	(380,685)
Monthly % Variance	2.41%	2.54%	-3.79%	11.71%	-3.00%	-5.61%	27.07%	59.82%	21.30%	-4.26%	-7.18%	-1.89%
12 Mo. Avg.	0.72%	2.67%	2.63%	3.37%	3.49%	3.72%	3.72%	4.46%	4.62%	4.05%	3.99%	2.23%
GCA	138	138	139	139	139	140	140	140	141	141	141	142
Month	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
Actual Gas Cost	24,664,387	15,163,792	15,010,629	8,585,686	2,473,327	2,172,633	2,168,872	2,187,097	2,282,502	5,677,560	14,435,945	18,077,721
Variance	2,322,942	(522,217)	(63,862)	(103,204)	517,061	166,444	(231,074)	(8,356)	(95,798)	196,408	(1,282,411)	909,978
Monthly % Variance	9.42%	-3.44%	-0.43%	-1.20%	20.91%	7.66%	-10.65%	-0.38%	-4.20%	3.46%	-8.88%	5.03%
12 Mo. Avg.	3.87%	3.00%	3.30%	2.56%	3.16%	3.45%	2.62%	1.19%	0.55%	0.92%	0.45%	1.60%
GCA	142	142	143	143	143	144	144	144	145	145	145	146
Month	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
Actual Gas Cost	22,652,167	16,245,076	16,772,955	5,608,209	3,006,102	1,865,600	1,561,858	1,561,600	1,586,271	3,940,195	11,139,702	12,187,945
Variance	(1,033,702)	(999,572)	1,406,536	(16,486)	(133,948)	(133,915)	(505,943)	(170,161)	(132,983)	(838,374)	(828,796)	(730,945)
Monthly % Variance	-4.56%	-6.15%	8.39%	-0.29%	-4.46%	-7.18%	-32.39%	-10.90%	-8.38%	-21.28%	-7.44%	-6.00%
12 Mo. Avg.	-1.40%	-1.81%	-0.49%	-0.43%	-1.01%	-1.28%	-1.54%	-1.69%	-1.74%	-2.73%	-2.38%	-4.20%
GCA	146	146	147	147	147	148	148	148	149	149	149	150
Month	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
Actual Gas Cost	12,791,023	12,620,659	7,383,182	4,317,200	2,906,287	1,331,877	1,368,247	1,630,453				
Variance	(1,500,513)	(779,086)	(464,555)	(442,851)	179,518	(668,512)	(334,647)	(98,921)				
Monthly % Variance	-11.73%	-6.17%	-6.29%	-10.26%	6.18%	-50.19%	-24.46%	-6.07%				
12 Mo. Avg.	-5.19%	-5.16%	-8.29%	-9.01%	-8.60%	-9.39%	-9.18%	-9.07%				

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing ***TESTIMONY OF HEATHER R POOLE*** has been served upon the following parties of record in the captioned proceeding by electronic service on October 30, 2020.

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