August 9, 2019

## E-PORTAL FILING

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Re:
DOCKET NO. 20190003-GU In re: Purchased Gas Adjustment (PGA) True-Up

Dear Mr. Teitzman:
Attached, for electronic filing in the above referenced docket, please find the Petition by Florida City Gas for Approval of PGA Factor to be Applied for Service Rendered During the Period January 2020 Through December 2020, along with Direct Testimony of Miguel Bustos and Exhibit MB-2. Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.


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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 

In re: Purchased Gas Adjustment (PGA) True-Up

Docket No. 20190003-GU
Filed: August 9, 2019

## PETITION BY FLORIDA CITY GAS FOR APPROVAL OF <br> PGA FACTOR TO BE APPLIED FOR SERVICE RENDERED DURING THE PERIOD JANUARY 2020 THROUGH DECEMBER 2020

Florida City Gas ("FCG" or "the Company") hereby submits this petition to the Commission requesting Approval of a Purchased Gas Adjustment ("PGA") Factor to be applied for service rendered during the projected period of January 1, 2020 through December 31, 2020. In support thereof, FCG states as follows:

1. The Company is a natural gas utility with its principal office located at:

Florida City Gas
4045 NW $97{ }^{\text {th }}$ Avenue
Doral, Florida 33178
2. Any pleading, motion, notice, order, or other document required to be served upon FCG or filed by any party to this proceeding should be served upon the following individuals:

| Beth Keating | Christopher Wright <br> Greg Munson <br> Genior Attorney |
| :--- | :--- |
| 215 South Monroe St., Suite 601 | Florida Power \& Light Company |
| Tallahassee, FL 32301 | 700 Universe Blvd (JB/LAW) |
| (850) 521-1980 | Juno Beach, Florida 33408 |
| $\underline{\text { BKeating@gunster.com }}$ | $\underline{\text { (561) 691-7144 }}$ |
| $\underline{\text { GMunson@gunster.com }}$ | $\underline{ }$ |

3. The Commission has jurisdiction pursuant to Sections 366.04, 366.05, and 366.06, Florida Statutes ("F.S.").
4. Natural gas utilities are permitted to seek recovery of the total costs incurred to procure and provide natural gas supply and capacity for its Sales (PGA) Customers through a
reconcilable PGA Factor. See In re: Investigation of Purchased Gas Adjustment Clauses Utilized by Regulated Natural Gas Distributors, Order No. 10237, Docket No. 800645-GU, 1981 Fla. PUC LEXIS 249 (FPSC Aug. 26, 1981); In re: Surveillance of purchased gas adjustments, Order No. 11212, Docket No. 820003-GU, 1982 Fla. PUC LEXIS 261 (FPSC Sept. 29, 1982).
5. The Commission has adopted a revised method for calculation and recovery of purchased gas costs by regulated natural gas utilities by means of a maximum levelized PGA Factor that may be charged to Sales Customers for each calendar year commencing January 1 and ending December 31. See In re: Purchased Gas Adjustment, Order Nos. 24463 and Order No. 24463-A, Docket No. 19910003-GU, 1191 Fla. PUC LEXIS 680 (FPSC May 17, 1991); In re: Consideration of change in frequency and timing of hearings, Order No. 1998-0691-FOF-PU, Docket No. 19980269-PU, 1998 Fla. PUC LEXIS 841 (FPSC May 19, 1998). The Commission has also adopted a method by which a natural gas utility may, at its option, request a mid-course correction if the projected gas costs significantly exceed projected revenues as calculated under the Commission-approved PGA Factor. See id.; see also In Re: Purchased Gas Adjustment (PGA) True-up, Order No. PSC-1993-0708-FOF-GU, Docket 1993003-GU (FPSC May 10, 1993)
6. FCG herein seeks Commission approval of its PGA Factor for the period January 1, 2020 through December 31, 2020 (the "Projection Period"). Submitted herewith and in support of FCG's proposed PGA Factor are the Direct Testimony of Miguel Bustos and Exhibit MB-2, which consists of Schedules E-1 WINTER, E-1, E-1/R, E-2, E-3, E-4, and E-5.
7. To calculate its proposed PGA Factor, FCG applied the methodology and prescribed schedules adopted by the Commission. The Schedules in FCG Exhibit MB-2 are used
to compute the maximum PGA Factor to be applied to bills for gas sold by FCG to its Sales Customers during the twelve-month Projection Period.
8. The final net true-up amount (including interest, adjustments, and the estimated under-recovery included in the 2019 PGA Factor) for the period January 2018 through December 2018 is an over-recovery of $\$ 190,684$. See FCG Exhibit MB-2, Schedule E-4.
9. The Actual/Estimated True-Up amount (based on actual data for six months and projected data for six months) for the current period January 2019 through December 2019 is an under-recovery of \$777,984. See FCG Exhibit MB-2, Schedule E-4.
10. The total net true-up for 2018 and 2019 is an under-recovery of $\$ 587,300$. See FCG Exhibit MB-2, Schedule E-4.
11. The Company estimates the total gas purchases by Sales Customers during the Projection Period will be $39,931,466$ therms. Applying the estimated sales to the net true-up results in a PGA true-up factor of 1.471 cents per therm to be applied during the Projection Period. See FCG Exhibit MB-2, Schedule E-4.
12. The total estimated cost of gas to be procured and supplied to Sales Customers during the Projection Period is \$24,328,929. See FCG Exhibit MB-2, Schedule E-1, line 11.
13. The weighted average cost of gas ("WACOG") based on the average of the winter and summer seasons for the Projection Period is 60.927 cents per therm. See FCG Exhibit MB-2, Schedule E-1, line 40.
14. Applying the 1.471 cents per therm net true-up factor increases the WACOG during the Projection Period to 62.397 cents per therm. When the regulatory assessment fee is added, this increases the WACOG to 62.711 cents per therm. See FCG Exhibit MB-2, Schedule E-1, lines 42 and 44.
15. Using a PGA Factor based on the average of the winter and summer seasons would lead to over or under-recoveries of gas costs in the two seasons. This problem is mitigated by establishing a maximum levelized PGA Factor based on the Company's expected winter cost of gas, thereby reducing the potential for large under-recoveries in the winter season when natural gas supply prices are typically higher. The Company is then able to flex the rate downward in the summer in order to match market conditions and reduce the potential for large over-recoveries in the summer season when natural gas supply prices are typically lower.
16. In order to avoid a large under-recovery in the winter season, FCG has selected a maximum levelized PGA Factor based on the Company's expected winter cost of gas. The maximum levelized PGA Factor based on the Company's expected winter cost of gas is 70.663 cents per therm before the regulatory assessment fees, and 71.019 cents per therm after the regulatory assessment fees. FCG submits that this is the appropriate maximum levelized PGA Factor that FCG may charge its Sales Customers during the Projection Period.

WHEREFORE, Florida City Gas respectfully requests that the Commission enter its order approving the Company's proposed maximum levelized PGA Factor of 71.019 cents per therm for application to Sales Customers’ bills beginning the first billing cycle in January 2020 through the last billing cycle December 2020.

Respectfully submitted this 9th day of August, 2019.


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Christopher T. Wright
Fla. Auth. House Counsel No. 1007055
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700 Universe Boulevard (JB/LAW)
Juno Beach, Florida 33408
Attorneys for Florida City Gas

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida City Gas's Petition for Approval of the Purchased Gas Adjustment ("PGA") Factor in Docket 20190003-GU, along with the Direct Testimony of Mr. Miguel Bustos and Exhibit MB-2, has been furnished by Electronic Mail to the following parties of record this 9th day of August 2019:

| Florida Public Utilities Company Mike Cassel 1750 S.W. 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com | MacFarlane Ferguson Law Firm Ansley Watson, Jr./Andrew Brown P.O. Box 1531 <br> Tampa, FL 33601-1531 <br> aw@macfar.com <br> AB@macfar.com |
| :---: | :---: |
| Kurt Schrader, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 kschrade@psc.state.fl.us | Office of Public Counsel J.R.Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Rehwinkel.Charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us |
| Peoples Gas System <br> Paula Brown/Kandi Floyd <br> P.O. Box 111 <br> Tampa, FL 33601-0111 <br> regdept@tecoenergy.com <br> kfloyd@tecoenergy.com | St. Joe Natural Gas Company, Inc. <br> Andy Shoaf <br> P.O. Box 549 <br> Port St. Joe, FL 32457-0549 <br> Andy@stjoegas.com |
| Florida City Gas <br> Carolyn Bermudez <br> 4045 NW 97th Avenue <br> Doral, Florida 33178 <br> Carolyn.Bermudez@nexteraenergy.com | Florida Power \& Light Company Christopher T. Wright 700 Universe Boulevard (JB/LAW) Juno Beach, Florida 33408 Christopher.Wright@fpl.com |



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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION FLORIDA CITY GAS <br> DIRECT TESTIMONY OF MIGUEL BUSTOS <br> DOCKET NO. 20190003-GU <br> (2020 Purchased Gas Adjustment Factor) <br> AUGUST 9, 2019

Q. Please state your name and business address.
A. My name is Miguel Bustos. My business address is 4045 NW 97 Avenue, Doral, Florida 33178.
Q. By whom are you employed and in what capacity?
A. I am employed by Florida City Gas ("FCG" or "Company") as Manager of Governmental \& Community Affairs. I have been with the Company for approximately 16 years.
Q. What are your responsibilities as Manager of Governmental \& Community Affairs?
A. I am responsible for managing FCG's Purchased Gas Adjustment clause, the overall strategic design and management of the Company's energy efficiency programs, as well as development of strategies of new business channels and emerging technologies. I am also responsible for providing direction and oversight for the Company's implementation of governmental and community affairs. I have held these responsibilities since 2013.
Q. Please describe your prior work experience and responsibilities.
A. I began my career at FCG in 2003. I progressed through roles in operations, budgeting, accounting, and business operations. Prior to joining FCG, I was a corporate lead auditor in PricewaterhouseCoopers.

## Q. What is your educational background?

A. I have a Bachelor of Science Degree in Accounting from the National Polytechnic Institute (Mexico City) and completed MBA coursework from the University of Americas.
Q. Please explain the purpose of your testimony.
A. I am submitting this testimony in support of FCG's request for Commission approval of a Purchased Gas Adjustment ("PGA") Factor to be applied for service to be rendered during the period of January 1, 2020 through December 31, 2020 (the "Projection Period"). My testimony will present the revised projected true-up for the current period January 1, 2019 through December 31, 2019 based on actual data for six months and projected data for six months (the "Actual/Estimated True-Up"). Then I will present the development of the proposed maximum PGA Factor to be charged to Sales Customers during the Projection Period.
Q. Has the Company prepared the form prescribed by this Commission for this purpose?
A. Yes. Attached to my testimony as Exhibit MB-2 are Schedules E-1, E-1/R, and E-2 through E-5, which are the forms prescribed by Commission Staff. These schedules are used to calculate FCG's Actual/Estimated True-Up for the current period and the maximum PGA Factor for the Projection Period.
Q. Can you explain the method used by the Company to calculate its projection of gas costs for the period January 2020 through December 2020?
A. Yes. To calculate its projected gas costs, FCG applied the methodology adopted by the Commission in Order No. PSC-1993-0708-FOF-GU issued on May 10, 1993, and modified in Docket No. 19980269-PU on May 19, 1993. Under this methodology, natural gas companies are to project their gas costs each twelve
months for the subsequent twelve-month period ending in December. A per therm rate is developed for the weighted average cost of gas ("WACOG") for the projected twelve-month period. However, this rate, which is based on the average of the winter and summer seasons, would lead to over or underrecoveries of gas costs in the two seasons. This problem is mitigated by establishing a maximum levelized PGA Factor, or cap, based on the Company's expected winter cost of gas, thereby reducing the potential for large underrecoveries in the winter season when natural gas supply prices are typically higher. The Company is then able to flex the rate downward in the summer in order to match market conditions and reduce the potential for large overrecoveries in the summer season when natural gas supply prices are typically lower.

## Q. What if the actual cost exceeds the maximum rate as projected?

A. If the revised projected gas costs exceed projected recoveries by at least $10 \%$ during the twelve-month period, a mid-course correction may formally be requested by the Company.
Q. How are differences between the Company's estimated and actual gas costs treated?
A. The forms prescribed by the Commission take this into consideration. Form E-2 calculates the projected differences using estimated figures, and form E-4 calculates the final net true-up using actual figures. These under/over recoveries are recovered from or credited to Sales Customers, as appropriate, through a
true-up factor included in the PGA Factor billed in the subsequent twelve month period.
Q. Are any Federal Energy Regulatory Commission ("FERC") tariff rate changes projected in this filing?
A. No, the FERC rates used in the preparation of this filing are based on those in effect on June 1, 2018.
Q. Can you summarize the contents of the schedules submitted as part of this filing?
A. Yes. Schedule E-1 shows the Projection Period, January 2020 through December 2020. For 2020, the Company projects the total gas purchases by Sales Customers will be $39,931,466$ therms (Schedule E-1, Line 27) at a total cost of $\$ 24,328,929$ (Line 11) with a resulting WACOG of 60.927 cents per therm (Schedule E-1, Line 40) before the application of the true-up factor and the regulatory assessment fee.

Schedule E-4 shows the final true-up of the revised estimated gas costs and the actual gas costs for the prior period, January 2018 through December 2018, which is an over-recovery of $\$ 190,684$ (Schedule E-4, Column 3, Line 4). This final true-up amount is net of interest, adjustments and the estimated underrecovery included in the 2019 PGA Factor. I previously submitted direct testimony and Exhibit MB-1 in support of the final PGA true-up amount for the period January 2018 through December 2018.

The projected true-up for the current period January 2019 through December 2019, based on six months actual data and six months projected data, is an under-recovery of $\$ 777,984$ (Schedule E-4, Column 4, Line 4). The total net true-up is an under-recovery of $\$ 587,300$ (Schedule E-4, Column 5, Line 4) which results in a true-up factor of 1.471 cents per therm that would be applied during the Projection Period (Schedule E-1, Line 41).

Applying the net true-up factor increases the WACOG for the Projection Period to 62.397 cents per therm (Schedule E-1, Line 42) before the regulatory assessment fee. With the regulatory assessment fee added, the WACOG is 62.711 cents per therm (Schedule E-1, Line 44) based on the average of the winter and summer seasons.
Q. Does the WACOG described above provide a sufficient basis to set the PGA Factor for the projection period?
A. No. As explained above, using a PGA Factor based on the average of the winter and summer seasons would lead to over or under-recoveries of gas costs in the two seasons. This problem is mitigated by establishing a maximum levelized PGA Factor, or cap, based on the Company's expected winter cost of gas, which may be flexed downward during the summer season. As shown on Schedule E1 Winter, FCG's maximum levelized PGA Factor based on the Company's projected winter cost of gas is as follows:

Winter Average, per Therm
Total Cost (Line 11)
Total Therm Sales (Line 27)
\$14,651,628
\$21,175,131

| (Line 11/ Line 27) | $\$ 0.69193$ |
| :--- | :--- |
| True-up (Line 41) | $\$ 0.01471$ |
| Before Regulatory Assessment (Line 42) | $\$ 0.70663$ |
| Revenue Tax Factor (Line 43) | $\$ 1.00503$ |
| Purchased Gas Factor (Line 44) | $\$ 0.71019$ |

9 A. Yes, it does.

| COST OF GAS PURCHASED |  | PROJECTION |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | OCT | NOV | DEC | JAN | FEB | MAR | TOTAL |
| 1 COMMODITY (Pipeline) |  | \$12,730 | \$13,611 | \$14,835 | \$15,922 | \$15,648 | \$15,130 | \$87,877 |
| 2 NO NOTICE RESERVATION |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 3 SWING SERVICE |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 4 COMMODITY (Other) |  | \$924,677 | \$1,019,130 | \$1,160,085 | \$1,352,392 | \$1,304,101 | \$1,209,347 | \$6,969,731 |
| 5 DEMAND |  | \$950,825 | \$1,293,941 | \$1,333,652 | \$1,333,652 | \$1,254,209 | \$1,333,652 | \$7,499,930 |
| 6 OTHER |  | \$47,108 | \$38,932 | \$29,657 | \$37,886 | \$33,035 | \$30,473 | \$217,091 |
| LESS END-USE CONTRACT |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 7 COMMODITY (Pipeline) |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 8 DEMAND |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 9 MARGIN SHARING |  | \$33,000 | \$18,000 | \$18,000 | \$18,000 | \$18,000 | \$18,000 | \$123,000 |
| 10 |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 11 TOTAL COST ( $1+2+3$ | -(7+8+9+10) | \$1,902,340 | \$2,347,614 | \$2,520,229 | \$2,721,852 | \$2,588,992 | \$2,570,601 | \$14,651,628 |
| 12 NET UNBILLED |  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 13 COMPANY USE |  | (\$1,240) | (\$1,431) | $(\$ 1,409)$ | (\$1,418) | $(\$ 1,373)$ | $(\$ 1,409)$ | $(\$ 8,279)$ |
| 14 THERM SALES REVENUES |  | \$1,901,100 | \$2,346,184 | \$2,518,819 | \$2,720,434 | \$2,587,620 | \$2,569,192 | \$14,643,349 |
| THERMS PURCHASED |  |  |  |  |  |  |  |  |
| 15 COMMODITY (Pipeline) |  | 3,067,510 | 3,279,859 | 3,574,758 | 3,836,584 | 3,770,571 | 3,645,848 | 21,175,131 |
| 16 NO NOTICE RESERVATION |  | - | - | - | - | - | - | - |
| 17 SWING SERVICE |  | - | -- | -- | -- | - | - | - |
| 18 COMMODITY (Other L15-L20 |  | 3,035,010 | 3,252,059 | 3,535,658 | 3,794,484 | 3,728,771 | 3,602,248 | 20,948,231 |
| 19 DEMAND |  | 14,554,190 | 20,686,500 | 21,376,050 | 21,376,050 | 19,996,950 | 21,376,050 | 119,365,790 |
| 20 OTHER |  | 34,500 | 29,800 | 41,100 | 44,100 | 43,800 | 45,600 | 238,900 |
| LESS END-USE CONTRACT |  | - | - | - | - | - | - | - |
| 21 COMMODITY (Pipeline) |  | - | - | - | - | - | - | - |
| 22 DEMAND |  | - | - |  | - | - | - | - |
| 23 |  | - | - | - | - | - | - | - |
| 24 TOTAL PURCHASES (+17+18 | +23) | 3,069,510 | 3,281,859 | 3,576,758 | 3,838,584 | 3,772,571 | 3,647,848 | 21,187,131 |
| 25 NET UNBILLED |  | -- | -- | -- | -- | -- | - | - |
| 26 COMPANY USE |  | $(2,000)$ | $(2,000)$ | $(2,000)$ | $(2,000)$ | $(2,000)$ | $(2,000)$ | $(12,000)$ |
| 27 TOTAL THERM SALES | (24-26) | 3,067,510 | 3,279,859 | 3,574,758 | 3,836,584 | 3,770,571 | 3,645,848 | 21,175,131 |
| CENTS PER THERM |  |  |  |  |  |  |  |  |
| 28 COMMODITY (Pipeline) | (1/15) | 0.00415 | 0.00415 | 0.00415 | 0.00415 | 0.00415 | 0.00415 | 0.00415 |
| 29 NO NOTICE RESERVATION | (2/16) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 30 SWING SERVICE | (3/17) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 31 COMMODITY (Other) | (4/18) | \$0.30467 | \$0.31338 | \$0.32811 | 0.35641 | 0.34974 | 0.33572 | 0.33271 |
| 32 DEMAND | (5/19) | \$0.06533 | \$0.06255 | \$0.06239 | 0.06239 | 0.06272 | 0.06239 | 0.06283 |
| 33 OTHER |  | \$1.06110 | \$0.95410 | \$0.46610 | 0.62100 | 0.51450 | 0.43800 | 0.90871 |
| LESS END-USE CONTRACT |  |  |  |  |  |  |  |  |
| 34 COMMODITY Pipeline | (7/21) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 35 DEMAND | (8/22) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 36 | (9/23) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 37 TOTAL COST | (11/24) | 0.61975 | 0.71533 | 0.70461 | 0.70908 | 0.68627 | 0.70469 | 0.69153 |
| 38 NET UNBILLED | (12/25) | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| 39 COMPANY USE | (13/26) | 0.61975 | 0.71533 | 0.70461 | 0.70908 | 0.68627 | 0.70469 | 0.69153 |
| 40 TOTAL THERM SALES | (11/27) | 0.62016 | 0.71577 | 0.70501 | 0.70945 | 0.68663 | 0.70508 | 0.69193 |
| 41 TRUE-UP | (E-2) | 0.01471 | 0.01471 | 0.01471 | 0.01471 | 0.01471 | 0.01471 | 0.01471 |
| 42 TOTAL COST OF GAS | $(40+41)$ | 0.63487 | 0.73047 | 0.71971 | 0.72415 | 0.70134 | 0.71978 | 0.70663 |
| 43 REVENUE TAX FACTOR | T. 001 | 1.00503 | 1.00503 | 1.00503 | 1.00503 | 1.00503 | 1.00503 | 1.00503 |
| 44 PGA FACTOR ADJUSTED FOR |  | 0.63806 | 0.73415 | 0.72333 | 0.72780 | 0.70487 | 0.72340 | 0.71019 |
| 45 PGA FACTOR ROUNDED TO |  | 0.638 | 0.734 | 0.723 | 0.728 | 0.705 | 0.723 | 0.710 |




FOR THE CURRENT PERIOD: JANUARY 2019 Through DECEMBER 2019

| TRUE-UP CALCULATION | ACTUAL |  |  |  |  |  | REVISED PROJECTIONS |  |  |  |  |  | TOTAL <br> PERIOD |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | JAN | FEB | MAR | APR | MAY | JuN | JUL | aug | SEP | ОСт | NOV | DEC |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1 PURCHASED GAS COST | \$1,444,422 | \$910,213 | \$1,048,302 | \$864,276 | \$594,298 | \$1,055,739 | \$1,003,656 | \$1,009,754 | \$1,003,407 | \$1,041,595 | \$1,133,583 | \$1,264,592 | \$12,373,837 |
| 1a MARGIN SHARING | \$0 | \$0 | \$0 | \$28,047 | \$1,043,400 | \$66,387 | \$63,000 | \$63,000 | \$43,000 | \$33,000 | \$18,000 | \$18,000 | \$1,375,834 |
| 2 TRANSPORTATION COST | \$1,430,592 | \$1,195,583 | \$1,317,832 | \$777,026 | \$666,823 | \$614,481 | \$683,778 | \$683,578 | \$665,334 | \$963,764 | \$1,307,735 | \$1,348,639 | \$11,655,164 |
| 3 TOTAL COST | \$2,875,014 | \$2,105,796 | \$2,366,134 | \$1,613,255 | \$217,721 | \$1,603,833 | \$1,624,434 | \$1,630,332 | \$1,625,740 | \$1,972,359 | \$2,423,318 | \$2,595,231 | \$22,653,168 |
| 4 FUEL REVENUES (Net of Revenue Tax) | \$2,079,646 | \$2,154,245 | \$1,987,118 | \$1,985,201 | \$1,953,906 | \$1,635,125 | \$1,623,377 | \$1,629,254 | \$1,624,667 | \$1,971,093 | \$2,421,859 | \$2,593,793 | \$23,659,283 |
| 4a Under-recovery* | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$59,016 | \$26,696 | \$33,594 | (\$264,930) | (\$602,820) | (\$617,448) | (\$1,365,891) |
| 4b ADJUSTED NET FUEL REVENUES * | \$2,079,646 | \$2,154,245 | \$1,987,118 | \$1,985,201 | \$1,953,906 | \$1,635,125 | \$1,682,393 | \$1,655,949 | \$1,658,261 | \$1,706,164 | \$1,819,039 | \$1,976,346 | \$22,293,392 |
| 5 TRUE-UP (COLLECTED) OR REFUNDED | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$34,819) | (\$417,828) |
| 6 FUEL REVENUE APPLICABLE TO PERIOD (LINE 4 + LINE 5) | \$2,044,827 | \$2,119,426 | \$1,952,299 | \$1,950,382 | \$1,919,087 | \$1,600,306 | \$1,647,574 | \$1,621,130 | \$1,623,442 | \$1,671,345 | \$1,784,220 | \$1,941,527 | \$21,875,564 |
| 7 TRUE-UP PROVISION - THIS PERIOD (LINE 6 - LINE 3) | $(\$ 830,187)$ | \$13,630 | $(\$ 413,835)$ | \$337,127 | \$1,701,366 | (\$3,527) | \$23,139 | (\$9,201) | $(\$ 2,298)$ | (\$301,015) | $(\$ 639,098)$ | (\$653,705) | $(\$ 777,604)$ |
| 8 INTEREST PROVISION-THIS PERIOD (21) | (\$1,281) | $(\$ 2,019)$ | $(\$ 2,357)$ | $(\$ 2,369)$ | (\$245) | \$1,494 | \$1,536 | \$1,619 | \$1,677 | \$1,458 | \$634 | (\$527) | (\$380) |
| 8a ADJUST PRIOR MONTHS' INTEREST 9 BEGINNING OF PERIOD TRUE-UP AND | (\$227,144) | (\$1,023,793) | $(\$ 977,363)$ | (\$1,358,736) | (\$989,159) | \$746,781 | \$779,567 | \$839,061 | \$866,297 | \$900,495 | \$635,757 | \$32,112 | (\$227,144) |
| INTEREST | $(327,144)$ | (\$1,023,793) | (\$97, 363 ) | (\$1,358,736) | (\$980,159) | \$74,781 | \$79,567 | \$83,061 | \$860,297 | \$900,495 | \$635,757 |  | (\$227,144) |
| 10 TRUE-UP COLLECTED OR (REFUNDED) (REVERSE OF LINE 5) | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$34,819 | \$417,828 |
| 10a ADJUSTMENTS (if applicable) | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
|  | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 11 TOTAL ESTIMATED/ACTUAL TRUE-UP $(7+8+9+10+10 \mathrm{a}+10 \mathrm{~b})$ | (\$1,023,793) | (\$977,363) | (\$1,358,736) | (\$989,159) | \$746,781 | \$779,567 | \$839,061 | \$866,297 | \$900,495 | \$635,757 | \$32,112 | (\$587,300) | (\$587,300) |
| INTEREST PROVISION |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 12 BEGINNING TRUE-UP AND INTEREST PROVISION ( $9+10 \mathrm{a}$ ) | (\$227,144) | (\$1,023,793) | (\$977,363) | (\$1,358,736) | (\$989,159) | \$746,781 | \$779,567 | \$839,061 | \$866,297 | \$900,495 | \$635,757 | \$32,112 |  |
| 13 ENDING TRUE-UP BEFORE | (\$1,022,512) | (\$975,344) | (\$1,356,379) | (\$986,790) | \$747,026 | \$778,073 | \$837,525 | \$864,679 | \$898,818 | \$634,299 | \$31,478 | (\$586,773) |  |
| INTEREST ( $12+10 \mathrm{~b}+7-5$ ) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 14 TOTAL (12+13) | (\$1,249,656) | (\$1,999,137) | (\$2,333,743) | (\$2,345,527) | $(\$ 242,133)$ | \$1,524,853 | \$1,617,091 | \$1,703,740 | \$1,765,115 | \$1,534,794 | \$667,236 | (\$554,661) |  |
| 15 AVERAGE ( $50 \%$ OF 14) | (\$624,828) | (\$999,562) | (\$1,166,872) | (\$1,172,763) | (\$121,067) | \$762,427 | \$808,545 | \$851,870 | \$882,558 | \$767,397 | \$333,618 | (\$277,330) |  |
| 16 INTEREST RATE - FIRST | 0.02500 | 0.02420 | 0.02420 | 0.02430 | 0.02420 | 0.02420 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 |  |
| DAY OF MONTH |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 17 INTEREST RATE - FIRST <br> DAY OF SUBSEQUENT MONTH | 0.02420 | 0.02420 | 0.02430 | 0.02420 | 0.02420 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 |  |
| 18 TOTAL ( $16+17$ ) | 0.04920 | 0.04840 | 0.04850 | 0.04850 | 0.04840 | 0.04700 | 0.04560 | 0.04560 | 0.04560 | 0.04560 | 0.04560 | 0.04560 |  |
| 19 AVERAGE (50\% OF 18) | 0.02460 | 0.02420 | 0.02425 | 0.02425 | 0.02420 | 0.02350 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 | 0.02280 |  |
| 20 MONTHLY AVERAGE (19/12 Months) | 0.00205 | 0.00202 | 0.00202 | 0.00202 | 0.00202 | 0.00196 | 0.00190 | 0.00190 | 0.00190 | 0.00190 | 0.00190 | 0.00190 |  |
| 21 INTEREST PROVISION (15x20) | $(1,281)$ | $(2,019)$ | $(2,357)$ | $(2,369)$ | (245) | 1,494 | 1,536 | 1,619 | 1,677 | 1,458 | 634 | (527) |  |



|  |  | PRIOR PERIOD: |  | JANUARY 18 - DECEMBER 18 |  | CURRENT PERIOD: <br> JAN 19 - DEC 19 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $(1)$ SIX MONTHS PLUS MONTHS REVIS | TUAL |  | $\begin{gathered} (3) \\ \mathrm{Col}(2)-\mathrm{Col}(1) \end{gathered}$ <br> DIFFERENCE | ${ }_{(4)}^{(4)}$ <br> SIX MONTHS ACTUAL PLUS SIX MONTHS REVISED ESTIMATE | $\begin{gathered} (5) \\ \hline \hline \mathrm{Col}(3)+\mathrm{Col}(4) \\ \text { TOTAL } \\ \text { TRUE-UP } \\ \hline \end{gathered}$ |
| 1 TOTAL THERM SALES \$ | E-2 Line 6 | \$21,514,848 | A-2 Line 6 | \$21,089,178 | (\$425,670) | E-2 Line 6** ${ }^{\text {* }}$ (21,875,564 | \$21,449,894 |
| 2 TRUE-UP PROVISION FOR THIS PERIOD OVER (UNDER) COLLECTION | E-2 Line 7 | (\$2,883,492) | A-2 Line 7 | (\$2,696,437) | \$187,055 | E-2 Line $7 \quad(\$ 777,604)$ | (\$590,548) |
| 2a ADJUSTMENTS | E-2 Line 10a | \$0 | A-2 Line 10b | \$0 | (\$945) | E-2 Line 10a ** \$0 | (\$945) |
| 2 b OSS $50 \%$ MARGIN SHARING | E-2 Line 10b | \$1,288,700 | A-2 Line 10b | \$1,288,700 | \$0 | E -2 Line 1a \$0 | \$0 |
| 3 INTEREST PROVISION FOR THIS PERIOD | E-2 Line 8 | \$16,422 | A-2 Line 8 | \$20,995 | \$4,573 | E-2 Line 8 (\$380) | \$4,193 |
| 4 END OF PERIOD TOTAL NET TRUE-UP | L2+2a+L3 | (\$1,578,371) |  | (\$1,386,742) | \$190,684 | $(\$ 777,984)$ | (\$587,300) |

NOTE: EIGHT MONTHS ACTUAL FOUR MONTHS REVISED ESTIMATE DATA OBTAINED FROM SCHEDULE (E-2).

| COLUMN (1) | DATA OBTAINED FROM SCHEDULE (E-2) |
| :--- | :--- |
| COLUMN (2) | DATA OBTAINED FROM SCHEDULE (A-2) |

TOTAL TRUE-UP DOLLARS

Over / (Under) Recovered | TOTAL TRUE-UP DOLLARS | $(\$ 587,300$ |
| :--- | :--- |
| PROJECTED THERM SALES | $39,931,466$ |

equals
True-up, charge / (credit)

\$0.01471 \$/Therm 1.471 Cents Per Therm

LINE 4 COLUMN (3) SAME AS LINE 7 SCHEDULE (A-7)
LINE 4 COLUMN (1) SAME AS LINE 8 SCHEDULE (A-7)
LINE 2 COLUMN (4) SAME AS LINE 7 SCHEDULE (E-2)
LINE 3 COLUMN (4) SAME AS LINE 8 SCHEDULE (E-2)

* Includes Off Sytem Sales and Margin Sharing revenues
** This adjustment is to properly reflect the true up balance due to a formula error in the 2018 true up filing on Schedule E-2 (Line 5)

|  | JAN | FEB | MAR | APR | MAY | Jun | JUL | AUg | SEP | ост | Nov | DEC | total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PGACOSTS |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1 COMMODITY COSTS | 1,368,314 | 1,319,748 | 1,224,477 | 1,040,820 | 973,614 | 932,995 | 913,966 | 903,460 | 896,711 | 937,407 | 1,032,742 | 1,174,920 | 12,719,174 |
| 2 TRANSPORTATION COSTS OTHER COSTS: | 1,333,652 | 1,254,209 | 1,333,652 | 775,280 | 671,020 | 652,759 | 671,020 | 671,020 | 652,759 | 950,825 | 1,293,941 | 1,333,652 | 11,593,787 |
| adminstrative costs | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 10,500 | 126,000 |
| CITY GATE PURCHASES | 27,386 | 22,535 | 19,973 | 24,390 | 23,345 | 18,806 | 18,023 | 36,379 | 35,933 | 36,608 | 28,432 | 19,157 | 310,968 |
| odorant charges | - | - | - | - | - | - | - | - | - | - | - | - | - |
| LeGAL | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 total pga costs | 2,739,852 | 2,606,992 | 2,588,601 | 1,850,990 | 1,678,479 | 1,615,061 | 1,613,510 | 1,621,359 | 1,595,902 | 1,935,340 | 2,365,614 | 2,538,229 | 24,749,929 |
| THERM SALES (FIRM) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 8 RESIDENTIAL | 1,782,472 | 1,757,355 | 1,656,952 | 1,490,862 | 1,328,588 | 1,178,474 | 1,071,119 | 1,026,984 | 1,036,106 | 1,123,963 | 1,316,120 | 1,575,756 | 16,344,751 |
| 9 GAS Lights | 1,853 | 1,851 | 1,839 | 1,835 | 1,838 | 1,826 | 1,816 | 1,805 | 1,802 | 1,798 | 1,796 | 1,803 | 21,863 |
| 10 COMMERCIAL | 1,986,621 | 1,946,753 | 1,923,529 | 1,894,771 | 1,883,631 | 1,859,919 | 1,873,036 | 1,872,851 | 1,868,825 | 1,876,557 | 1,897,234 | 1,932,806 | 22,816,533 |
| 11 LARGE COMMERCIAL | 65,637 | 64,613 | 63,528 | 62,520 | 61,513 | 60,702 | 59,458 | 58,475 | 57,578 | 65,193 | 64,709 | 64,393 | 748,319 |
| 12 natural gas vehicles |  |  |  |  |  |  |  |  |  |  |  |  | . |
| 13 total firm | 3,836,584 | 3,770,571 | 3,645,848 | 3,449,988 | 3,275,570 | 3,100,921 | 3,005,429 | 2,960,116 | 2,964,312 | 3,067,510 | 3,279,859 | 3,574,758 | 39,931,466 |
| THERM SALES (INTERRUPTIBLE) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 14 INTERRUPTIBLE PREFERRED |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 15 Interruptible large volume |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 16 total interruptible | - | - | - | - | - | - | - | - | . | - | - | - | - |
| THERM TRANSPORTED |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 17 COMMERCIAL TRANSP. | 4,605,627 | 4,607,197 | 4,609,376 | 4,626,030 | 4,619,146 | 4,632,873 | 4,625,463 | 4,602,427 | 4,636,331 | 4,627,897 | 4,617,979 | 4,615,644 | 55,425,990 |
| 18 SMALL COMMERCIAL TRANSP. FIRM | 2,877,669 | 2,848,394 | 2,828,490 | 2,804,378 | 2,792,150 | 2,783,549 | 2,771,510 | 2,766,289 | 2,763,214 | 2,763,859 | 2,780,555 | 2,811,693 | 33,591,749 |
| 19 Small commercial tr-inter. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 20 SMALL COMMERCIAL TRANSP - NGV |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 21 Interruptible transp. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 22 contract interrupt. Transp. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 23 Interrupt.LG. VoL. TRANSP. |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 24 CONTR. $\operatorname{INTERR.LG.~VOL.~TRANSP.~}$ |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 25 SPECIAL CONTRACT TRANSP. | 762,892 | 777,432 | 790,235 | 733,825 | 698,942 | 678,329 | 680,670 | 673,543 | 645,146 | 658,731 | 686,107 | 689,055 | 8,474,906 |
| 26 TOTAL TRANSPORTATION | 8,246,187 | 8,233,023 | 8,228,101 | 8,164,233 | 8,110,238 | 8,094,750 | 8,077,644 | 8,042,259 | 8,044,691 | 8,050,486 | 8,084,641 | 8,116,392 | 97,492,645 |
| TOTAL THERMS SALES \& TRANSP. | 12,082,771 | 12,003,595 | 11,873,949 | 11,614,222 | 11,385,808 | 11,195,671 | 11,083,072 | 11,002,375 | 11,009,003 | 11,117,997 | 11,364,500 | 11,691,150 | 137,424,111 |
| NUMBER OF CUSTOMERS (FIRM) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 27 RESIDENTIAL | 103,162 | 103,207 | 103,250 | 103,300 | 103,350 | 103,404 | 103,458 | 103,516 | 103,575 | 103,634 | 103,697 | 103,760 | 103,443 |
| 28 GASLIGHTS | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 |
| 29 commercial | 5,031 | 5,033 | 5,034 | 5,035 | 5,036 | 5,038 | 5,039 | 5,040 | 5,042 | 5,043 | 5,044 | 5,046 | 5,038 |
| 30 LARGE COMMERCIAL | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 |
| 31 NATURAL GAS VEHICLES |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 32 total firm | 108,212 | 108,258 | 108,302 | 108,354 | 108,405 | 108,460 | 108,515 | 108,575 | 108,636 | 108,696 | 108,760 | 108,824 | 108,500 |
| NUMBER OF CUSTOMERS (INTERRUPTIBLE) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 33 INTERRUPTIBLE PREFERRED |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 34 Interruptible Large volume |  |  |  |  |  |  |  |  |  |  |  |  | - |
| NUMBER OF CUSTOMERS (TRANSPORTATION) |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 36 COMMERCIAL TRANSP. | 99 | 98 | 98 | 98 | 98 | 99 | 99 | 99 | 99 | 99 | 98 | 99 | 99 |
| 37 SMALL COMMERCIAL TRANSP. FIRM | 2,972 | 2,986 | 2,999 | 3,012 | 3,025 | 3,039 | 3,052 | 3,066 | 3,079 | 3,092 | 3,106 | 3,119 | 3,046 |
| 38 SMALL COMMERCIAL TR-INTER. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 39 SMALL COMMERCIAL TRANSP - NGV |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 40 Interruptible transp. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 41 CONTRACT INTERRUPT. TRANSP. |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 42 Interrupt. Lg. vol. transp. |  |  |  |  |  |  |  |  |  |  |  |  | - |
|  |  |  |  |  |  |  |  |  |  |  |  |  | - |
| 44 SPECIAL CONTRACT TRANSP. | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 45 TOTAL TRANSPORTATION | 3,072 | 3,085 | 3,098 | 3,112 | 3,125 | 3,139 | 3,152 | 3,165 | 3,179 | 3,192 | 3,205 | 3,219 | 3,145 |
| TOTAL CUSTOMERS | 111,284 | 111,343 | 111,400 | 111,465 | 111,530 | 111,599 | 111,667 | 111,740 | 111,814 | 111,888 | 111,966 | 112,043 | 111,645 |



