State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

September 20, 2019

TO:

Office of Commission Clerk

FROM:

Lynn M. Deamer, Chief of Auditing, Office of Auditing and Performance Analysis

RE:

Docket No.: 20190083-GU

Company Name: Sebring Gas System, Inc.

Company Code: GU617

Audit Purpose: A1f: File & Suspend Rate Case (PAA)

Audit Control No.: 2019-170-1-1

Attached is the final audit report for the Utility stated above. I am sending the Utility a copy of this memo and the audit report. If the Utility desires to file a response to the audit report, it should send a response to the Office of Commission Clerk. There are no confidential work papers associated with this audit.

LMD/cmm

Attachment:

Audit Report

cc:

Office of Auditing and Performance Analysis File.

State of Florida



Public Service Commission

Office of Auditing and Performance Analysis
Bureau of Auditing
Tallahassee District Office

Auditor's Report

Sebring Gas System, Inc. File and Suspend Rate Case

Twelve Months Ended December 31, 2018

Docket No. 20190083-GU Audit Control No. 2019-170-1-1 September 17, 2019

> Marisa N. Glover Audit Manager

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Table of Contents

Purpo	ose	1
Objec	ctives and Procedures	2
	t Findings	
	Utility Plant in Service and Accumulated Depreciation	
2:	Operations and Maintenance Expense	10
3:	Taxes Other than Income	12
Exhit	bits	
1:	Rate Base	13
2:	Net Operating Income	14
3:	Capital Structure	15
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Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the objectives set forth by the Division of Accounting and Finance in its audit service request dated June 19, 2019. We have applied these procedures to the attached schedules prepared by Sebring Gas Company, Inc. in support of its filing for rate relief in Docket No. 20190083-GU.

The report is intended only for internal Commission use.

Objectives and Procedures

General

Definitions

Sebring/Utility refers to Sebring Gas Company, Inc.

USOA refers to the FERC Uniform System of Accounts as adopted by Commission Rule 25-7.014 – Records and Reports in General, Florida Administrative Code. (F.A.C.)

Test year refers to twelve months ended December 31, 2018.

Test year +1 refers to January 1, 2019 to December 31, 2019.

Projected test year refers to January 1, 2020 to December 31, 2020.

Background

Sebring has provided natural gas utility service to its customers since 1991 and now serves more than 622 natural gas customers across three counties in Florida.

The Utility's last historic rate base was established as of December 20, 2004, in Docket No. 20040270-GU, by Order No. PSC-2004-1260-PAA-GU.

Objectives: The objective in this proceeding is to determine that rate base, net operating income and capital structure for the historical test year ended December 31, 2018 are representative, and in conformity with current Commission policy for purposes of calculating revenue requirements.

Procedures: We performed the following specific objectives and procedures to satisfy the overall objective identified above.

Rate Base

Utility Plant in Service

Objectives: The objectives were to determine whether utility plant in service (UPIS): 1) Consists of property that exists and is owned by the Utility, 2) Additions are authentic, recorded at original cost, and properly classified as a capital item in compliance with Commission rules, 3) Retirements are made when a replacement item is put into service, 4) Adjustments required in the Utility's last rate case proceeding were recorded in its books and records, and 5) To determine the test year ending balance and 13 month average.

Procedures: We recalculated the Utility's UPIS annual activities from 2005 through 2018, reconciled to the general ledger, and traced the 2004 ending balance to Order No. PSC-2004-1260-PAA-GU. We also recalculated the year end and 13-month average. We randomly tested the UPIS additions from 2005 through 2018 and removed the additions that the Utility did not provide the requested supporting documentation as of September 17, 2019. Finding 1 discusses UPIS.

We reviewed the Utility's test year +1 UPIS ending balances schedule, and traced the additions to the testimony and, where applicable, to the Orders issued in Dockets 20130079-GU and

20130130-GU. These two Dockets concerned the Sebring's investment in infrastructure (and the contracts entered into) to provide service to Hardee Correctional Institution and DeSoto Correctional Institution. We recalculated the amortization and depreciation expenses applying the approved depreciation rates from Order No. PSC-2016-0574-PAA-GU.

We reviewed the Utility's 2020 UPIS ending balance schedule, and traced the construction of the distribution system in the City of Wachula and the City of Arcadia to the Utility's testimony. We recalculated the amortization and depreciation expenses applying the approved depreciation rates from Order No. PSC-2016-0574-PAA-GU. The Utility's ending balance as of December 2019 on Schedule G-1 pg 13 was carried over incorrectly on Schedule G-1 pg 14 for January 2020, the amortization was \$4,803 more than the audit staff's recalculation. We did not adjust this amount since it was a proforma.

Construction Work in Progress

Objectives: The objectives were to determine the nature and purpose of utility projects recorded as construction work in progress (CWIP), and whether projects that are eligible to accrue allowance for funds used during construction (AFUDC) are excluded from rate base pursuant to Commission Rule 25-7.0141, F.A.C. – Allowance for Funds Used During Construction, CWIP balances are properly stated, and to recalculate the 13-month average balance for CWIP for the test year.

Procedures: We obtained the Utility's CWIP filing schedule, reconciled to the general ledger, recalculated the 13-month average, and traced the charges to the supporting documentation. The Utility did not have any AFUDC.

Accumulated Depreciation

Objectives: The objectives were to determine whether accruals, retirements and adjustments to accumulated depreciation (AD) are properly recorded in compliance with the USOA, to determine whether the Utility used the depreciation rates established in the following Order PSC-2016-0574-PAA-GU. The objectives are also to determine whether the balances are properly stated based on Commission adjustments in the prior rate case in Order No. PSC-2004-1260-PAA-GU, and to recalculate the year-end and 13-month average balance for AD.

Procedures: We recalculated the AD from 2005 through 2018, reconciled to the general ledger, and traced all the adjustments from 2005 through the 2011 to the depreciation study Order No. PSC-2007-0482-PAA-GU and Order No. PSC-2012-0043-PAA-GU. We also recalculated the year-end and the 13-month average. This AD testing is the UPIS times the rate. However, we were unable to perform the sample testing of the AD adjustments from 2012 through 2018 since the Utility did not provide the requested supporting documentation as of September 17, 2019. Finding 1 discusses Accumulated Depreciation.

Working Capital

Objectives: The objectives were to determine whether the working capital (WC) account balances are properly stated based on Commission adjustments in the prior rate case in Order No. PSC-2004-1260-PAA-GU, and to recalculate the year end and 13-month average balance for WC.

Procedures: We verified, based on a judgmental sample of selected accounts, that the WC balance is properly stated, utility in nature, non-interest bearing, does not include non-utility items, and is consistent with the order cited above. We verified, based on a judgmental sample of selected accounts, that the accumulated provision accounts year end balances comply with the Commission rules. We recalculated the year-end balance and a sample of 13-month average balances for selected WC accounts included in the filing. No exceptions were noted.

Net Operating Income

Operating Revenue

Objectives: The objectives were to determine whether: 1) Utility charges were those approved by the Commission in the Utility's current authorized tariff, and 2) Revenue earned from utility property during the test year was recorded and properly classified in compliance with Commission rules.

Procedures: We reconciled 2018 revenues to the general ledger. We recalculated a sample of customer bills to ensure that the Utility was using the rates authorized in its approved tariffs. We verified there were not any unbilled revenues. No exceptions were noted.

Operation and Maintenance Expense

Objectives: The objectives were to determine whether 2018 operation and maintenance (O&M) expenses are properly recorded in compliance with the USOA, the O&M expenses are properly stated based on Commission adjustments in the prior rate case in Order No. PSC-2004-1260-PAA-GU, and were reasonable for ongoing utility operations.

Procedures: We traced the operating and maintenance expense balances from the filing to the general ledger. We verified, based on a judgmental sample of utility transactions for select O&M expense accounts, that 2018 O&M expense balances are adequately supported by source documentation, utility in nature, and are recorded consistent with the USOA. We traced the O&M Expense adjustments to source documents and noted that they were consistent with the order cited above. Finding 2 discusses operating and maintenance expense.

Depreciation Expense

Objectives: The objectives were to determine whether 2018 depreciation expense is properly recorded in compliance with the USOA and based on Commission adjustments in the prior rate case in Order No. PSC-2004-1260-PAA-GU, and to determine that depreciation expense accruals are calculated using the depreciation rates established in Order No. PSC-2016-0574-PAA-GU.

Procedures: We recalculated the 2018 depreciation expenses by applying the current approved depreciation rates and reconciled to the general ledger. Finding 1 discusses Depreciation Expense.

Taxes Other than Income

Objectives: The objectives were to determine whether Taxes Other Than Income (TOTI) expenses are: 1) properly recorded in compliance with Commission Rules, 2) Reasonable for ongoing utility operations, and 3) Recorded in compliance with the USOA, and 4) Reflect the Commission adjustments in the prior rate case in Order No. PSC-2004-1260-PAA-GU.

Procedures: We verified, based on a judgmental sample of transactions for select TOTI accounts, that TOTI expenses are adequately supported by source documentation. We traced the TOTI adjustments to source documents and noted that they were consistent with the order cited above. Finding 3 discusses TOTI.

Income Taxes

Objectives: The objective was to reconcile the federal and state income taxes to the MFRs and the general ledger, and to determine whether deferred income tax expense and the deferred tax balances include proper bonus depreciation treatment of property additions.

Procedures: Audit staff traced the Utility's net operating income reflected in the MFRs to the general ledger. We reviewed the Utility's federal income tax that reconciles the MFR amounts for the taxable income per books, the temporary and permanent differences, and the deferred income tax balances to the tax returns. We traced selected items to the 2018 tax return. No exceptions were noted and no further work was performed.

Capital Structure

Objectives: The objectives were to determine whether the non-utility assets supported by the Utility's capital structure were removed in the rate base/capital structure reconciliation, the cost rates used in the computation of the cost of capital are appropriate, the rate base adjustments were adjusted in the capital structure, and to reconcile the Utility book amounts to the MFRs and the general ledger.

Procedures: Audit staff reconciled the cost of capital cost rates for the historical base year to the debt documentation. We obtained a reconciliation of the adjustments to the capital structure and traced these to the MFRs and the general ledger. No exceptions were noted.

Other

Accumulated Deferred Income Taxes

Objectives: The objective was to determine whether Accumulated Deferred Income Taxes (ADIT) as noted per the Utility's rate case filing is representative of the Utility's books and records.

Procedures: We reviewed the Utility's MFR B-18 schedule and reconciled it to the general ledger. We reviewed the Utility's 2018 tax returns, and reconciled selected items to Utility support. We also reviewed Utility provided support and reconciled the documentation to the general ledger. No exceptions were noted.

Analytical Review

Objectives: The objectives were to determine whether any regulated plant in service, revenues and O&M account balances contained any information that could be deemed unusual, and to assist in assessing risk.

Procedures: Audit staff performed a cost comparison for rate base components and O&M expenses by account from 2014 to 2018 in order to compare percentage increases between the Utility's last rate case in Docket No. 20040270-GU and its current filing. We did not find any significant variances. No exceptions were noted.

Internal and External Audits

Objectives: The objective was to determine whether there were any exceptions and disclosures noted in any internal or external audits applicable to this current rate proceeding.

Procedures: We asked if the Utility had any internal or external audits for the historical test year ended December 31, 2018. There were none.

Board of Director Meetings

Objectives: The objective was to review the minutes of the Board of Directors.

Procedures: We reviewed the BOD meeting and Committee meeting minutes from February 2013 through March 2019 for activities or issues that could affect the Utility in the current rate case proceeding. No exceptions were noted.

Audit Findings

Finding 1: Utility Plant in Service and Accumulated Depreciation

Audit Analysis: We recalculated the annual activities of the Utility Plant-in-Service (UPIS) from 2005 through 2018, reconciled to the general ledger, and randomly selected plant additions for sample testing. We requested the Utility to provide the invoices, contracts, customer agreement, and other supporting documentation for the selected sample items. As the result of unsupported documentation, some of the sample items were removed from the plant additions, which reduced the UPIS by (\$52,421). Audit staff also recalculated the 2018 Depreciation Expense (DE) with the deduction of the adjusted plant additions. Below are the recalculation of UPIS for year ended 2018 and the 13-month average, and 2018 DE. See Table 1-1 for UPIS, Table 1-2 for Accumulated Depreciation, and Table 1-3 for Depreciation Expense.

Table 1-1
UPIS TYE 2018

	Util	Utility Audit			Audit	it			
• • • • • • • • • • • • • • • • • • •		13-Month		Αu	dit Balance	13-Month			
Account - Description	12/31/2018	Average	Adjustments	1	2/31/2018		Average		
301-Organization	\$ 127,409	\$ 127,409		\$	127,409	\$	127,409		
302-Intangible	4,000	4,000		\$	4,000	\$	4,000		
374-Land and Land Rights	22,625	22,625		\$	22,625	\$	22,625		
376.0- Mains - Steel	187,703	187,703		\$	187,703	\$	187,703		
376.1-Mains - Plastic	2,584,727	2,551,718	1,485	\$	2,586,212	\$	2,553,203		
378-M&R Station Equipment - General	18,003	18,003		\$	18,003	\$	18,003		
379-M&R Station Equipment - Gate	1,234,110	1,234,110		\$	1,234,110	\$	1,234,110		
380.0-Services - Steel	350,793	350,957		\$	350,793	\$	350,957		
380.1-Services - Plastic	853,915	810,550	(2,364)	\$	851,551	\$	808,186		
381-Meters	290,984	290,190		\$	290,984	\$	290,190		
382-Meter installations	172,970	159,125		\$	172,970	\$	159,125		
383-Regulators	32,227	32,227		\$	32,227	\$	32,227		
384-Regulator Installations	77,195	74,324		\$	77,195	\$	74,324		
386-Customer Converstion Cost	35,310	35,310		\$	35,310	\$	35,310		
387-Other Equipment	23,209	23,209		\$	23,209	\$	23,209		
390-Structure and Improvements	13,278	13,278		\$	13,278	\$	13,278		
391.0-Office Furniture	2,836	2,836		\$	2,836	\$	2,836		
391.1-Office Equipment	32,665	31,503		\$	32,665	\$	31,503		
392-Transportation Equip - Light Truck	260,619	224,269	(46,833)	\$	213,786	\$	177,436		
394-Tools/Shop/Garage Equipment	19,297	16,576		\$	19,297	\$	16,576		
397-Power Operated Equipment	30,902	30,902		\$	30,902	\$	30,902		
397-Communication Equipment	38,692	33,529	(4,708)	\$	33,984	\$	28,821		
Total:	\$ 6,413,469	\$ 6,274,353	\$ (52,421)	\$	6,361,048	\$	6,221,932		

We recalculated the Utility's accumulated depreciation accruals from 2005 through 2018, reconciled to the general ledger, randomly selected the utility adjustments reflected in the general ledger, and requested the supporting documentation for these adjustments. We were unable to determine whether these adjustments were appropriate because the supporting documentation was not provided as of September 17, 2019. We recalculated the 2018 year-end balance and 13-month average with the exclusion of the total adjustments of (\$44,501).

Table 1-2
ACC DEP TYE 2005 THROUGH 2018

	Uti	lity	Audit			
Account - Description	12/31/2018	13-Month Average	Adjusted AD	Audit Balance 12/31/2018	13-Month Average	
301.0- Organizational Costs	\$ 108,602	\$ 106,202		\$ 108,602	\$ 106,202	
376.0- Mains - Steel	174,362	171,641	2,357	176,719	173,998	
376.1-Mains - Plastic	883,893	846,713	2,815	886,708	849,528	
378-M&R Station Equipment - General	9,711	9,432		9,711	9,432	
379-M&R Station Equipment - Gate	247,595	227,849		247,595	227,849	
380.0-Services - Steel	420,726	418,971	(1,313)	419,413	417,658	
380.1-Services - Plastic	254,582	241,390	(11,771)	242,811	229,619	
381-Meters	198,167	192,642	(3,920)	194,247	188,722	
382-Meter Installations	59,670	57,125		59,670	57,125	
383-Regulators	27,205	26,705		27,205	26,705	
384-Regulator Installations	41,577	40,455		41,577	40,455	
386-Customer Converstion Cost	31,650	31,244		31,650	31,244	
387-Other Equipment	9,203	8,739		9,203	8,739	
390-Structure and Improvements	3,300	3,134		3,300	3,134	
391.0-Office Furniture	681	624		681	624	
391.1-Office Equipment	28,790	28,095		28,790	28,095	
392-Transportation Equip - Light Trucks	152,847	142,618	(61,552)	91,295	81,066	
394-Tools/Shop/Garage Equipment	12,867	12,304	2,972	15,839	15,276	
397-Power Operated Equipment	22,836	21,925	(3,142)	19,694	18,783	
397-Communication Equipment	7,468	6,509		7,468	6,509	
Total	: S 2,695,732	\$ 2,594,317	\$ (73,553)	\$ 2,622,179	\$ 2,414,562	

Table 1-3

DEPRECIATION EXPENSES 2018

		Utility	Audit	Audit Balance		
Account - Description		/31/2018	Adjustments	12/31/2018		
301-Organization costs	\$	4,800	\$ -	\$	4,800	
376.0- Mains - Steel	\$	5,443		\$	5,443	
376.1-Mains - Plastic		74,945	43	\$	74,988	
378-M&R Station Equipment - General		558		\$	558	
379-M&R Station Equipment - Gate		39,492		\$	39,492	
380.0-Services - Steel		3,510		\$	3,510	
380.1-Services - Plastic		25,944	(76)	\$	25,868	
381-Meters		11,030		\$	11,030	
382-Meter Installations		4,932		\$	4,932	
383-Regulators		999		\$	999	
384-Regulator Installations		2,230		\$	2,230	
386-Customer Converstion Cost		812		\$	812	
387-Other Equipment		928		\$	928	
390-Structure and Improvements		332		\$	332	
391.0-Office Furniture		113		\$	113	
391.1-Office Equipment		1,384		\$	1,384	
392-Transportation Equip - Light Truck		20,100	(4,215)	\$	15,885	
394-Tools/Shop/Garage Equipment		1,105		\$	1,105	
397-Power Operated Equipment		1,823	:	\$	1,823	
397-Communication Equipment		1,874	(278)	\$	1,596	
Total:	\$	202,354	\$ (4,526)	\$	197,828	

Effect on the General Ledger: The Utility should determine the effect on the general ledger.

Effect on the Filing: Audit staff determined the 2018 year-end and 13-month average balances for UPIS to be \$6,361,048 and \$6,221,932. We determined the 2018 Depreciation Expense to be \$197,828. We determined the year-end and 13-month average balances for accumulated depreciation to be \$2,622,179 and \$2,414,562.

Finding 2: Operations and Maintenance Expense

Audit Analysis: In MFR Schedule C-5, the Utility had a total amount of \$551,665. In the MFR Schedule C-2, the Utility made adjustments to decrease Conservation Expenses by \$48,049, Office Supplies by \$149, and increase Miscellaneous General Expenses by \$245. The adjustments were to remove Conservation Expenses, Lobbying Expenses, and Out of Period Adjustments. In MFR Schedule C-1, the Utility has the adjusted balance as \$503,713. Table 2-1 shows audit staffs adjustments.

Table 2-1

Account	Description	llance per R, Schedule C-5	IFR Adj edule C-2	alance per R, Schedule C-1	Αι	ıdit Adj	ance per Audit /31/2018
870	Supervision and Engineering	\$ 13,828	\$ -	\$ 13,828	\$	-	\$ 13,828
874	Mains & Services Expenses	\$ 33,797	\$ -	\$ 33,797	\$	-	\$ 33,796
878	Meter & House Reg Expense	\$ 6,941	\$ -	\$ 6,941	\$	-	\$ 6,941
879	Customer Installations	\$ 24,692	\$ -	\$ 24,692	\$	-	\$ 24,693
880	Other Expenses	\$ 8,893	\$ -	\$ 8,893	\$	-	\$ 8,892
885	Supervision and Engineering	\$ 1,937	\$ -	\$ 1,937	\$	-	\$ 1,939
887	Maintenance Of Mains	\$ 11,790	\$ •	\$ 11,790	\$	-	\$ 11,788
891	MTCE of Meas & Reg Gate Station	\$ 8,232	\$ -	\$ 8,232	\$	-	\$ 8,233
892	Maintenance of Services	\$ 2,431	\$ -	\$ 2,431	\$	-	\$ 2,431
893	MTCE of Meters & House Regulator	\$ 9,385	\$ -	\$ 9,385	\$	-	\$ 9,384
894	MTCE of Other Equipment	\$ 6,196	\$ -	\$ 6,196	\$	-	\$ 6,195
902	Meter Reading Expense	\$ 5,096	\$ -	\$ 5,096	\$	360	\$ 5,456
903	Cus Records & Collection	\$ 1,619	\$ -	\$ 1,619	\$	-	\$ 1,618
904	Uncollectible Account	\$ 522	\$ •	\$ 522	\$	-	\$ 522
908	Conservation Expense	\$ 48,049	\$ (48,049)	\$ -	\$	-	\$. •
920	Admin & Gen Salaries	\$ 215,806	\$ •	\$ 215,806	\$	(1,767)	\$ 214,039
921	Office Supplies & Exp	\$ 29,306	\$ (149)	\$ 29,157	\$	(1,541)	\$ 27,616
922	Admin Exp Trans (CR)	\$ (45,979)	\$ -	\$ (45,979)	\$	-	\$ (45,979)
923	Outside Services Employed	\$ 33,566	\$ -	\$ 33,566	\$	•	\$ 33,566
924	Property Insurance	\$ 26,631	\$ -	\$ 26,631	\$	-	\$ 26,635
925	Injuries and Damages	\$ 40,543	\$ -	\$ 40,543	\$	-	\$ 40,544
926	Employee Pension & Benefits	\$ 30,353	\$ •	\$ 30,353	\$	(394)	\$ 29,959
930	Misc General Expense	\$ (245)	\$ 245	\$ -	\$	-	\$ -
931	Rents	\$ 16,126	\$ -	\$ 16,126	\$	-	\$ 16,125
933	Transportation Expense	\$ 22,150	\$ -	\$ 22,150	\$		\$ 22,152
Total		\$ 551,665	\$ (47,953)	\$ 503,712	\$	(3,342)	\$ 500,371

- Account 902- Meter Reading Expense: We are increasing by \$360 related to meter readings that were incorrectly posted to Account 920.
- Account 920-Administrative and General Salaries- We are decreasing this account by \$1,767. Audit staff removed \$360 related to meter readings and moved to Account 902. In addition, we removed \$1,409 of salaries as unsupported by timesheets. The Utility includes related payroll taxes in this account.

- Account 921-Office Salaries and Expenses- We are decreasing this account by \$1,541. The Utility recorded a credit card late payment fee of \$39, and a political donation of \$1,500 paid to the Florida Natural Gas Political Action Committee. The Utility includes related payroll taxes in this account.
- Account 926-Employee Pensions and Benefits- We decreased by \$394 for an out of period monthly payment, which was recorded in December 2018, but pertained to January 2019.

Effect on the General Ledger: The Utility should determine the effect on the General Ledger. Effect on the Filing: Operation and Maintenance Expense should be decreased by \$3,342.

Finding 3: Taxes Other than Income

Audit Analysis: Audit staff reviewed the FPSC Regulatory Assessment Fee (RAF) forms filed by the utility and recalculated the RAF using the FPSC RAF rate. We also verified the tangible property taxes incurred by the utility for the historical test year. We found that the property tax expense did not reflect the maximum discount available. The maximum discount available was on November 30, 2018 and property taxes should be reduced by \$72. We reviewed the invoices provided by the Utility and found Sales Tax for 2018 was overstated by \$121. See Tables 3-1 for audit staff's adjustments.

Table 3-1

	For the 12 Month Test Year Ended 12/31/2018								
Description		Per Utiltiy MFR Schedule C-30 pg 2	Adjustments			Per Audit			
Regulatory Assessment Fees (RAF)	\$	4,855	\$	-	\$	4,855			
Tangible Tax	\$	13,646	\$	(72)	\$	13,574			
Sales Tax	\$	421	\$	(121)	\$	300			
Occupational Licenses	\$	266	\$	-	\$	266			
Total	\$	19,188	\$	(193)	\$	19,000			

Effect on the General Ledger: The Utility should determine the effect on the general ledger.

Effect on the Filing: Tangible property taxes for 2018 should be reduced by \$72, and Sales tax by \$116.

Exhibits

Exhibit 1: Rate Base

CHE	DULE B-2		RATE BASE - 13-MONTH AVERAGE	PAGE 1 OF 1 TYPE OF DATA SHOWN HISTORIC BASE YEAR DATA: 12/31/201 WITNESS: J. MELENDY		
	IDA PUBLIC SERVICE COMMISSION PANY: SEBRING GAS SYSTEM, INC.		TION: PROVIDE A SCHEDULE CALCULATING A 13 RATE BASE AS ADJUSTED FOR THE HISTORIC B			
	KET NO: 20190083-GU					
.DE		AVERAGE	AD III CHICALT	ADJUSTED AVERAGE		
NO.	DESCRIPTION	PER BOOKS	ADJUSTMENT	AVERAGE		
	UTILITY PLANT IN SERVICE.					
1	GAS PLANT IN SERVICE	\$6,274,352	30	\$6,274,352		
	PLANT HELD FOR FUTURE USE	\$0	\$0	\$0		
	CWIP ·	\$19,733	\$0 ***	\$19,733 \$0		
4	GAS PLANT ACQ. ADJ.	\$0				
5	GROSS UTILITY PLANT	\$6,294,085	\$0	\$6,294,085		
	DEDUCTIONS					
6	ACCUM, PROVISION FOR DEPR.	(\$2,594,318)	\$0	(\$2,594,318)		
	CUSTOMER ADVANCES FOR CONSTR	(\$6,897)	\$0	(\$6,897)		
8	TOTAL DEDUCTIONS	(\$2,601,215)	<u> </u>	(\$2,601,215)		
9	NET UTILITY PLANT	\$3.692.870	<u> </u>	\$3,692,870		
	ALLOWANCE FOR WORKING CAPITAL					
	ALCONANCE FOR HORANG CAP TIME					
10	BALANCE SHEET METHOD	\$27.139	(\$3,507)	\$23,632		
11	TOTAL RATE BASE	\$3,720,009	(\$3,507)	\$3,716,502		
.,	TO THE TOTAL BRIDE					

12	NET OPERATING INCOME	\$244.974	\$5,092	\$250,066		
13	RATE OF RETURN	6 59%		6.73%		

Exhibit 2: Net Operating Income

SCHEDULE C-1			NET OPER	PAGE 1 OF 1				
COMPA	A PUBLIC SERVICE COMMISSION NY: SEBRING GAS SYSTEM, INC. T NO: 20190083-GU		TION. PROVIDE THE C DIME PER BOOKS FO AND THE	TYPE OF DATA SHOWN. HISTORIC BASE YEAR DATA: 12/31/2018 HISTORIC BASE YEAR DATA - 1: 12/31/201 WITNESS: J. MELENDY				
		NET OPER	ATING INCOME - HIST	FORIC BASE YEAR EN	DED 12/31/18			
		(1) PRIOR YEAR ENDED	(2) CURRENT HISTORIC BASE	(3)	(4)	(5)	(6)	
		TOTAL COMPANY PER BOOKS	YEAR ENDED		COMPANY		JURISDICTIONAL	
LINE		(BASE YEAR - 1)	PER BOOKS		ADJUSTED	REVENUE	AMOUNT	
NO.		12/31/2017	12/31/2018	ADJUSTMENTS	(2) - (3)	ADJUSTMENT	PROPOSED RATES	
1	TOTAL OPERATING REVENUES	\$973,478	\$1,080,949	(\$47,794)	\$1,033,155	\$0	\$1,033,155	
	OPERATING EXPENSES							
2	COST OF GAS	\$0	\$0	\$0	\$0	\$0		
3	OPERATIONS & MAINTENANCE	\$511,406	\$551,665	(\$47,953)	\$503,712	\$0		
4	DEPRECIATION & AMORTIZATION	\$193,727	\$202,354	\$0	\$202,354	\$0		
5	TAXES OTHER THAN INCOME TAXES	\$28,203	\$19,188	\$0	\$19,188	\$0	\$19,188	
6	CURRENT FEDERAL INCOME TAX EXPENSE	\$0	\$49,958	\$1,388	\$51,346	\$0	\$51,346	
7	CURRENT STATE INCOME TAX EXPENSE	\$0	\$12,810	(\$69)	\$12,741	\$0	\$12,741	
8	DEFERRED FEDERAL INCOME TAX EXPENSE	\$0	\$0	(\$5,375)	(\$5,375)	so	(\$5,375)	
9	DEFERRED STATE INCOME TAX EXPENSE	\$0	\$0	(\$877)	(\$877)	\$0		
10	TOTAL OPERATING EXPENSES	\$733,336	\$835,975	(\$52,886)	\$783,069	\$0	\$783,089	
		\$240,142	\$244,974	\$5.092	\$250,066	\$0		
11	NET OPERATING INCOME	3240,142	3299,874	\$3,092	32,50,000			

Exhibit 3: Capital Structure

7 TOTAL

\$3,720,009

SCHEDULE D-10

VV.123422 V									
				IN: RECONCILE THE TOTAL CAPITAL STRUCTURE LL BALANCE SHEET ACCOUNTS AND INDIVIDUAL DURRENT COMMISSION RULES, POLICY, AND PRI	TRUCT RATE BASE.	TYPE OF DATA SHOWN: HISTORIC BASE YEAR DATA: 1 WITNESS: R. MELENDY			
DOCKET NO:	20190083	-GU		YEAR ENDED	12/31/2018				
	LINE NO.	TOTAL COMPA CAPITAL STRUC		RECONCLING		RECONCILE CAPITAL STRUC			
		COMPONENT	PER BOOKS	RECONCILING ITEMS	SPECIFIC	PRORATA	COMPONENT	ADJUSTED	
	1	COMMON EQUITY	\$1,819,926	SEE SCHEDULE D-1, PAGE 1	\$0	(\$1,716)	COMMON EQUITY	\$1,818,210	
	2	LONG TERM DEBT	\$1,666,523	SEE SCHEDULE D-1, PAGE 1	\$0	(\$1,571)	LONG TERM DEBT	\$1,664,952	
	3	SHORT TERM DEST	\$63,030	SEE SCHEDULE D-1, PAGE 1	\$0	(\$59)	SHORT TERM DEBT	\$62,971	
	4	CUSTOMER DEPOSITS	\$144,171	SEE SCHEDULE D-1, PAGE 1	\$0	(\$136)	CUSTOMER DEPOSITS	\$144,035	
	5	DEFERRED INCOME TAXES	\$26,359	SEE SCHEDULE D-1, PAGE 1	\$0	(\$25)	DEFERRED INCOME TAXES	\$26,334	
	6	OTHER (EXPLAIN)	\$0	SEE SCHEDULE D-1, PAGE 1	\$0	\$0	OTHER (EXPLAIN)	\$0	

PAGE 1 OF 1

\$3,716,502