

Agenda Date: 09/11/15 Agenda Item: 2I

STATE OF NEW JERSEY Board of Public Utilities 44 South Clinton Avenue, 9th Floor Post Office Box 350 Trenton, New Jersey 08625-0350 <u>www.nj.gov/bpu/</u>

ENERGY

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IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR APPROVAL OF BASE RATE ADJUSTMENTS PURSUANT TO THE STORM HARDENING AND RELIABILITY PROGRAM ("SHARP") DECISION AND ORDER APPROVING STIPULATION

DOCKET NO. GR15040496

Parties of Record:

Ira Megdal, Esq., Cozen O'Connor, P.C. on behalf of South Jersey Gas Company. **Stefanie A. Brand, Esq.**, Director, New Jersey Division of Rate Counsel

BY THE BOARD:1

On August 20, 2014, the New Jersey Board of Public Utilities ("Board") issued an Order², approving an August 6, 2014 stipulation of settlement establishing South Jersey Gas Company's ("Company") Storm Hardening and Reliability Program ("SHARP").

The SHARP stipulation provides:

- SHARP investments will be made over a three (3)year period ending June, 30, 2017, with project costs not to exceed \$34.5 million per year, plus or minus 15%, with a total cap of \$103.5 million, excluding Allowance for Funds Used During Construction ("AFUDC") over the three (3) year period;
- ii) Low pressure mains will be replaced by high pressure mains and associated services;

¹ Commissioner Upendra J. Chivukula recused himself due to a potential conflict of interest and as such took no part in the discussion or deliberation of this matter.

² In the Matter of the Petition of South Jersey Gas Company for Approval of a Storm Harding and Reliability Program (SHARP) and Associated Recovery Mechanism, BPU Docket No. GO13090814, September 20, 2014.

- iii) Fifty-two (52) regulator stations are to be eliminated and excess flow valves installed in specified municipalities;³
- iv) Incremental annual base rate adjustments are to be made effective on October 1, 2015, 2016 and 2017, based on applications filed in April which include the minimum filing requirements ("MFRs") described in Attachment A of the August 2014 Stipulation ("Annual Filing");
- v) SHARP projects must be incremental to the Company's regular construction budget for the period ending June 30, 2017, and in their totality will be subject to prudency review in the Company's next base rate case to be filed no later than October 1, 2017;
- vi) Annual revenue requirements and AFUDC are to be calculated in the manner described in paragraphs 25 and 28 of the August 2014 Stipulation, respectively; and
- vii) Base rate adjustments resulting from the Annual Filings will be provisional and subject to refund solely based on future finding by the Board that the Company imprudently incurred capital expenditures through the SHARP.

In April 2015, the Company made its initial Annual Filing seeking authority to recover in base rates the revenue requirements associated with approximately \$37 million in SHARP expenditures ("April filing"). Subsequently, it was determined that the after-tax weighted average cost of capital ("WACC") rate reflected in the April filing should be 6.26% and not 7.10%. The revenue requirement (excluding sales and use tax ("SUT")) based on the 6.26% after-tax WACC is \$3.791 million and calculated as follows:

	SHARP - REVENUE REQUIREME	
	as of June 30, 2015	(\$000)
1	Plant in Service [incl. AFUDC]	\$36,904
2	Accumulated Depreciation	-\$124
3	Accumulated Deferred Tax	-\$2,541
4	SHARP Program Rate Base	\$34,239
5	After-Tax WACC	6.26%
6	Return Requirement	\$2,144
7	Depreciation Expense, Net of Tax	\$73
8	Revenue Recovery	\$2,217
9	Revenue Factor	1.70972
10	Revenue Requirement [excl. SUT]	\$3,791

Following notice, public hearings were held in this matter on August 20, 2015, in Voorhees, New Jersey. No members of the public appeared.

³ The municipalities involved are Atlantic City, Ventnor City, Margate, Longport, Ocean City, Wildwood, North Wildwood, Wildwood Crest and West Cape May.

After review of discovery, the Company, the Division of Rate Counsel ("Rate Counsel") and Board Staff (collectively, "the Parties") discussed the issues in this matter, and on August 26, 2015, the Parties executed a Stipulation of Settlement ("Stipulation")⁴

The key elements of the Stipulation are as follows:

- The revenue requirement tied to SHARP investments of approximately \$36.9 million being rolled into base rates is \$4.0566 million (including SUT) as calculated on Schedule A attached to the Stipulation.
- The Company's agreed-upon base rate adjustments, as set forth on Schedule B attached to the Stipulation, should be made effective on October 1, 2015 and are deemed "provisional", subject to a prudency review in the Company's next base rate case to be filed no later than October 1, 2017; and
- The rate impact of increased Company revenue tied to this docket for the residential heating customer using 100 therms during a winter month is an increase of \$1.11 (0.8%).

DISCUSSION AND FINDINGS

Based on the Board's careful review and consideration of the record in this proceeding, the Board <u>HEREBY FINDS</u> the Stipulation to be reasonable and in accordance with the law, striking an appropriate balance between the needs of customers and of the Company.

Accordingly, the Board <u>HEREBY</u> <u>ADOPTS</u> the Stipulation in its entirety, and <u>HEREBY</u> <u>INCORPORATES</u> its terms and conditions as though fully set forth herein.

The Board <u>HEREBY</u> <u>AUTHORIZES</u> the Company to provisionally recover in base rates the estimated annual revenue requirement of \$4.0566 million (including SUT) tied to the first year of SHARP investments made through June 30, 2015 with the necessary rate adjustments to be effective for service rendered on and after October 1, 2015.

The Company's costs remain subject to audit by the Board. This Decision and Order shall not preclude, nor prohibit, the Board from taking any actions determined to be appropriate as a result of any such audit.

The Company is <u>HEREBY</u> <u>DIRECTED</u> to file tariff sheets conforming to the terms and conditions of this Order within five (5) business days of the effective date of this Order.

⁴ Although described in this Order, should there be any conflict between this summary and the Stipulation, the terms of the Stipulation control, subject to the findings and conclusions of this Order.

The effective date of this Order is September 21, 2015.

DATED: BOARD OF PUBLIC UTILITIES 9-11-15 BY: **RICHARD S. MROZ** PRESIDENT JOSEPH L. FIORDALISO COMMISSIONER A HOLDEN ¢ommissioner DIANNE SOLOMON COMMISSIONER ATTEST TRENE KIM ASBURY SECRETARY

I HEREBY CERTIFY that the within document is a true copy of the original in the files of the Board of Public Utilities

IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR APPROVAL OF BASE RATE ADJUSTMENTS PURSUANT TO THE STORM HARDING AND RELIABILITY PROGRAM ("SHARP")

DOCKET NO. GR15040496

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Steven R. Cocchi, Esq. Vice President, Rates & Regulatory Requirements

August 26, 2015

Irene Kim Asbury, Secretary NJ Board of Public Utilities 44 South Clinton Avenue, 9th Floor P. O. Box 350 Trenton, NJ 08625-0350

Re: In the Matter of the Petition of South Jersey Gas Company For Approval of Base Rate Adjustments Pursuant to the Storm Hardening and Reliability Program ("SHARP") BPU Docket No. GR15040496

Dear Secretary Asbury:

Attached please find a Stipulation of Settlement in the above referenced matter, which has been executed on behalf of South Jersey Gas Company, Board of Public Utilities Staff and the Division of Rate Counsel.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Steven R. Cocchi

SRC:lvk Attachment

cc: Attached Service List

IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR APPROVAL OF BASE RATE ADJUSTMENTS PURSUANT TO THE STORM HARDENING AND RELIABILITY PROGRAM ("SHARP") BPU DOCKET NO. GR15040496

SERVICE LIST

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SOUTH JERSEY GAS COMPANY

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STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE BOARD'S ESTABLISHMENT OF A GENERIC PROCEEDING TO REVIEW THE COSTS, BENEFITS AND RELIABILITY IMPACTS OF MAJOR STORM EVENT MITIGATION EFFORTS	::	BPU DOCKET NO. AX13030197
IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR APPROVAL OF BASE RATE ADJUSTMENTS PURSUANT TO THE STORM HARDENING AND RELIABILITY PROGRAM ("SHARP")	::	BPU DOCKET NO. GR15040496

STIPULATION OF SETTLEMENT

Ira G. Megdal, Esq. and Stacy A. Mitchell, Esq. (Cozen O'Connor, Attorneys) for the Petitioner, South Jersey Gas Company

Felicia Thomas-Friel, Esq., Deputy Rate Counsel, Henry M. Ogden, Esq., Assistant Deputy Rate Counsel, and Maura Caroselli, Esq., Assistant Deputy Rate Counsel, for the New Jersey Division of Rate Counsel (Stefanie A. Brand, Director)

Alex Moreau and Veronica Beke, Deputy Attorneys General, for the Staff of the New Jersey Board of Public Utilities (John J. Hoffman, Acting Attorney General of New Jersey)

TO THE HONORABLE COMMISSIONERS OF THE BOARD OF PUBLIC UTILITIES:

This Stipulation of Settlement addresses the Petition filed by South Jersey Gas Company

("SJG" or the "Company") with the New Jersey Board of Public Utilities (the "Board" or

"BPU") on April 30, 2015, and subsequently updated on July 15, 2015, for base rate adjustments

to provide for cost recovery associated with the Company's Storm Hardening and Reliability

Program ("SHARP"), which was approved by the Board on August 20, 2014 in Docket Nos.

AX13030197 and GO13090814.

BACKGROUND

 On March 20, 2013, the Board issued an Order initiating a generic proceeding (the "Storm Mitigation Proceeding") to investigate possible avenues to support and protect New Jersey's utility infrastructure so that it may be better able to withstand the effects of major storm events.

2. The Board's Order in the Storm Mitigation Proceeding found that it was appropriate to invite all regulated utilities subject to Board jurisdiction to submit detailed proposals for infrastructure upgrades designed to protect the State's utility infrastructure from future major storm events.

3. On September 3, 2013, South Jersey filed a Petition with the Board seeking approval of a Storm Hardening and Reliability Program ("SHARP"). The Company proposed to invest approximately \$280 million in the replacement of low pressure distribution main and associated services with high pressure distribution main and associated services in certain coastal areas over a seven year period, to eliminate 52 regulator stations that would no longer be necessary, to install Excess Flow Valves and to utilize an associated recovery mechanism for the costs to be collected from ratepayers through an annual SHARP Rate Adjustment.

4. After notice and public hearings, on August 20, 2014 the Board approved a Stipulation entered into among the Company, Board Staff, the Division of Rate Counsel and the New Jersey Large Energy Users Coalition (collectively, the "Parties") approving the SHARP and setting forth the authorized investments and cost recovery mechanism to be utilized (the "SHARP Order")

5. The Stipulation approved by the Board provided that the SHARP will include the replacement of low pressure mains and associated services with high pressure mains and

associated services, the elimination of 52 regulator stations and the installation of Excess Flow Valves in the municipalities of Atlantic City, Ventnor City, Margate, Longport, Ocean City, Wildwood, North Wildwood, Wildwood Crest and West Cape May. The Stipulation also provided that the SHARP would not include the replacement of meters.

6. The Stipulation further provided that the SHARP would encompass a three (3) year period ending June 30, 2017, with project costs not to exceed \$34.5 million per year, plus or minus 15%, with a total cap of \$103.5 million, excluding Allowance for Funds Used During Construction ("AFUDC").

7. At the time the SHARP was approved by the Board, the Company had already commenced work on SHARP projects. In addition, at the time the SHARP was approved, the Company had a base rate case pending at the Board that utilized a test year ending June 30, 2014¹. The SHARP Stipulation acknowledged that work associated with SHARP projects had already commenced and provided that those projects that were placed in-service as of June 30, 2014 would be recognized in the Company's then pending base rate case. The Stipulation further provided that the cost recovery mechanism described in the Stipulation would apply to SHARP projects placed in service after July 1, 2014.

8. Pursuant to the SHARP Stipulation, cost recovery for SHARP projects is effectuated by an annual adjustment to base distribution rates to take place on October 1 ("SHARP Rate Adjustment") accomplished through the Company's filing of annual Revenue Adjustment Filings ("Annual Filing").

¹ In the Matter of the Petition of South Jersey Gas Company for Approval of Increased Base Tariff Rates and Charges for Gas Service and Other Tariff Revisions, BPU Docket No. GR13111137, Order dated August 20, 2014.

PROCEDURAL HISTORY

9. The Company's made its first Annual Filing ("First Annual Filing") on April 30, 2015, seeking recovery of the revenue requirements associated with SHARP projects placed into service from July 1, 2014 through June 30, 2015. In the First Annual Filing, the Company provided actual SHARP investment data for the period July 1, 2014 through March 31, 2015 and forecasted data for the period April 1, 2015 through June 30, 2015.

10. In its First Annual Filing, the Company sought authority to recover SHARP revenue requirements of approximately \$4.6 million associated with actual and projected SHARP investments of approximately \$37 million, including AFUDC. The impact of the rates proposed in the First Annual Filing to the typical residential heating customer using 100 therms of natural gas during a winter month would be an increase of \$1.26, or 0.9%. The SHARP investments, revenue requirement and base rate adjustment were supported by the Direct Testimony of Paul Zuccarino and Steven Cocchi.

11. On July 15, 2015, the Company filed an update to its First Annual Filing providing a full year of actual SHARP investment data through June 30, 2015. This filing provided updated schedules supporting a revenue requirement of approximately \$4.6 million associated with approximately \$36.9 million of SHARP investments, including AFUDC, and also provided an updated proposed base rate adjustment. The impact of the rates proposed in the update to the typical residential heating customer using 100 therms of natural gas during a winter month would be an increase of \$1.25, or 0.9%.

12. Following proper public notice, public hearings were held in this matter on August 20, 2015 in Voorhees, New Jersey. No members of the public appeared or spoke.

13. SJG has received and responded to all discovery requests that have been propounded in this proceeding by BPU Staff and the New Jersey Division of Rate Counsel ("Rate Counsel").

STIPULATED TERMS

14. Upon review of the First Annual Filing, the July 15, 2015 update, the accompanying Testimony and Schedules, and the Company's responses to written data requests, and after settlement discussions among the Company, Board Staff and Rate Counsel (collectively, the "Parties"), the Parties STIPULATE AND AGREE as follows.

15. The revenue requirement associated with the approximately \$36.9 million of SHARP investments being rolled into base rates shall be \$4,056,657, including Sales and Use Tax ("SUT"). The calculation of this revenue requirement is set forth on Schedule A, attached hereto.

16. The Company may implement the base rates set forth on Schedule B, attached hereto, effective October 1, 2015. The impact of these rates to the typical residential heating customer using 100 therms of natural gas during a winter month would be an increase of \$1.11, or 0.8%.

17. The Parties agree that, pursuant to the SHARP Order, SHARP projects will be subject to a prudency review in the Company's next base rate case and the base rate adjustments agreed upon herein will be provisional and subject to refund solely based upon a future finding by the Board that SJG imprudently incurred capital expenditures through the SHARP.

MISCELLANEOUS

18. This Stipulation represents a mutual balancing of interests and, therefore, is intended to be accepted and approved in its entirety. In the event this Stipulation is not adopted in its entirety by the Board, then any party hereto is free to pursue its then available legal remedies with respect to all issues addressed in this Stipulation as though this Stipulation had not been signed.

19. It is specifically understood and agreed that this Stipulation represents a negotiated agreement and has been made exclusively for the purpose of this proceeding. Except as expressly provided herein, South Jersey, Staff and Rate Counsel shall not be deemed to have approved, agreed to, or consented to any principle or methodology underlying or supposed to underlie any agreement provided herein. Also, all rates are subject to Board audit.

20. This Stipulation may be executed in as many counterparts as there are signatories of this Stipulation, each of which counterparts shall be an original, but all of which shall constitute one and the same instrument.

WHEREFORE, the Parties hereto do respectfully submit this Stipulation and request that the Board issue a Decision and Order approving it in its entirety, in accordance with the terms hereof, as soon as reasonably possible.

SOUTH JERSEY GAS COMPANY

JOHN J. HOFFMAN ACTING ATTORNEY GENERAL OF NEW **JERSEY**

Attorney for Staff of the Board of Public Utilities

By:

negdik

By:

Ira G. Megdal, Esquire Cozen O'Connor

Cat Alex Moreau Deputy Attorney General

DIVISION OF RATE COUNSEL Stefanie Brand, Esq. Director $\mathbf{B}\mathbf{Y}$ Henry Ogden, Esq. Assistant Deputy Rate Counsel

Dated: August 26, 2015

SOUTH JERSEY GAS COMPANY STORM HARDENING AND RELIABILITY PROGRAM ("SHARP") REVENUE REQUIREMENT

Line

No		
1	Actual Plant in Service as of June 30, 2015	\$36,642,641
2	AFUDC as of June 30, 2015	262,031
3	Gross Plant in Service as of June 30, 2015	36,904,672
4		
5	Accumulated Depreciation	(124,124)
6		· · · /
7	Accumulated Deferred Tax ⁽¹⁾	(2,541,360)
8		(2,041,000)
9	SHARP Program Rate Base	34,239,188
10	UNALL HOGIANTIALE Dase	04,200,100
11	After-Tax WACC	6.26%
12		0.2078
13	Return Requirement	2,144,058
14	Return Requirement	2,144,000
15	Depreciation Expense, Net of Tax	73,419
16	Depreciation Expense, Net of Tax	73,419
	Paranua Pasavan	2 247 477
17	Revenue Recovery	2,217,477
18	Deveryon Footon	1 00040
19	Revenue Factor	1.82940
20	Total Devenue Derwinsmant	¢4 050 057
21	Total Revenue Requirement	\$4,056,657
22		
23	Total Revenue Requirement, excluding SUT	\$3,791,269
24		
25		
26		
27	⁽¹⁾ Accumulated Deferred Tax	
28	Plant in Service at June 30, 2015	\$36,642,641
29	AFUDC	262,031
30		36,904,672
31		
32	Bonus Depreciation	5,154,700
33	Tax Depreciation	1,190,624
34	Book Depreciation	(124,124)
35	Net	6,221,201
36		-;
37	Deferred Tax	\$2,541,360
5,		

			 Prese	Rates	_	Proposed Rates					
Component	Amount	<u>Units</u>	 Rate		Revenue		Rate		Revenue	Increase	
			 F	RSG	i				RSG		
Residential Service											
Customer Charge	4,055,511	Bills	\$ 9.00	\$	36,499,599	\$	9.00	\$	36,499,599		
Distribution Charge	255,393,546	Therms	0.498637		127,348,672		0.509012		129,998,380		
CIP Revenues					-				-		
CIRT Revenues				_	-			-			
Total Base Revenues				\$	163,848,271			\$	166,497,979	1.6%	

General Service (0-100,000 Ar		 0	SG		GSG					
Customer Charge	286,978	Bills	\$ 27.25	\$	7,820,151	\$	27.25	\$	7,820,151	
Distribution Charge	95,087,060	Therms	0.398903		37,930,513	c	.406684		38,670,386	
CIP Revenues					-				-	
CIRT Revenues Total Base Revenues				5	45,750,664			5	46,490,536	1.6%

1,000 + Annual (GS	G-L\	<u>/</u>	GSG-LV					
2,063	Bills	\$ 150.00	\$	309,450	\$	150.00	\$	309,450	
204,557	Mcf	9.0000		1,841,013		9.0000		1,841,013	
31,185,054	Therms	0.216751		6,759,392	a	.221371		6,903,467	
				-	l			-	
			-	-				-	1.6%
	2,063 204,557	 2,063 Bills \$ 204,557 Mcf	2,063 Bills \$ 150.00 204,557 Mcf 9 0000	2,063 Bills \$ 150.00 \$ 204,557 Mcf 9.0000	2,063 Bills \$ 150.00 \$ 309,450 204,557 Mcf 9.0000 1,841,013 31,185,054 Therms 0.216751 6,759,392	2,063 Bills \$ 150.00 \$ 309,450 \$ 204,557 Mcf 9.0000 1,841,013 31,185,054 Therms 0.216751 6,759,392 C -	2,063 Bills \$ 150.00 \$ 309,450 \$ 150.00 204,557 Mcf 9.0000 1,841,013 9.0000 31,185,054 Therms 0.216751 6,759,392 0.221371	2,063 Bills \$ 150.00 \$ 309,450 \$ 150.00 \$ 204,557 Mcf 9,0000 1,841,013 9.0000 31,185,054 Therms 0.216751 6,759,392 0.221371 - -	2,000 + Annual Therms) 2,063 Bills \$ 150.00 \$ 309,450 \$ 150.00 \$ 309,450 204,557 Mcf 9.0000 1,841,013 9.0000 1,841,013 9.0000 1,841,013 31,185,054 Therms 0.216751 6,759,392 0.221371 6,903,467

			Present Rates					Proposed Rates					
Component	Amount	<u>Units</u>	Jnits		Revenue			Rate	Revenue		Increase		
				(CTS					CTS			
Comprehensive Firm Transport	ation Service												
Customer Charge	580	Bills	\$	600.00	\$	348,000	\$	600.00	\$	348,000			
Demand Charge	148,155	Mcf		27.4213		4,062,603		27.4213		4,062,603			
Distribution Charge	27,954,358	Therms		0.033123		925,932		0.036210		1,012,227			
CIRT Revenues						-				-			
Total Base Revenues					\$	5,336,535			\$	5,422,830	1.6%		

			 L	.vs		LVS					
Large Volume Service											
Customer Charge	360	Bills	\$ 900.00	\$	324,000	\$	900.00	\$	324,000		
Demand Charge	398,130	Mcf	14.8842		5,925,847		14.8842		5,925,847		
Distribution Charge	99,751,830	Therms	0.033023		3,294,105	0	.034570		3,448,421		
CIRT Revenues					-				-		
Total Base Revenues				\$	9,543,951			\$	9,698,267	1.6%	

Electric Generation Service	 	GS		EGS						
Customer Charge	6 6	Bills	\$ 25.00	\$	1,650	\$	25.00	\$	1,650	
Demand Charge	2,4 34	Mcf	6.500		15,821		6.5000		15,821	
Distribution Charge (Nov - Mar.)	89,990	Therms	0.113023		10,171	0	115638		10,406	
Distribution Charge (Apr - Oct.)	166,293	Therms	0.083023		13,806	0	085638		14,241	
CIRT Revenues									-	
Total Base Revenues				\$	41,448			\$	42,118	1.6%

<u>Component</u>	Amount	Units	 Prese Rate	nt Rates Revenue	Pro Rate	Increase	
			 EG	S-LV		EGS-LV	
Electric Generation Service - La	rge Volume						
Customer Charge	24	Bills	\$ 180.00	51,840	\$ 180.00	51,840	
Demand Charge	22,800	Mcf	19.090	435,251	19.435441	443,128	
Distribution Charge	3,373,811	Therms	-	-	-	-	
CIRT Revenues				_	_	-	
Total Base Revenues				\$ 487,091	\$	494,968	1.6%

			 N	IGV		NGV					
Natural Gas Vehicle Service											
Cust. Charge 0-999 CFH	12	Bills	\$ 37.50	\$	450	\$	37.50	\$	450		
Cust. Charge 1,000-4,999 CFH	35	Bills	75.00		31,500		75.00		31,500		
Cust. Charge 5,000-24,999 CFH	12	Bills	200.00		28,800		200.00		28,800		
Cust. Charge 25,000+ CFH	36	Bills	600.00		259,200		60 0.00		259,200		
Distribution Charge	1,206,617	Therms	0.133800		161,445	0	140252		169,230		
Subtotal Distribution				\$	481,395			\$	489,180	<u>1.6</u> %	
Compression Charge Total Base Revenues	663,510	Therms	0.5428	\$	360,133 841,528		0.5428	\$	360,133 849,313		

			Prese	nt Rat	65	Proposed Rates					
Component	Amount	<u>Units</u>	 Rate Revenue		evenue	Rate	Revenue		Increase		
			 (GLS			G	GLS			
Gas Lights Service						ı					
Yard Lights	12	Mantles	\$ 7.178664	\$	1,034	\$ 7.294754	\$	1,050			
Street Lights	431	Mantles	\$ 7.738706		40,025	\$ 7.863853		40,672			
Total Base Revenues				\$	41,058		\$	41,722	1.6%		

TOTAL SYSTEM BASE DISTRIBUTION REVENUES	<u>\$ 234,800,401</u>	<u>\$ 238,591,664</u> <u>1.6</u>	%

TOTAL SYSTEM INCLUDING OTHER REVENUES

<u>\$ 234.800.401</u>

<u>\$ 238.591.664</u> <u>1.6</u>%

INCREASE	INCREASE	3,791,263
TARGET INCREASE	TARGET INCREASE	3,791,269
Difference	Difference	(\$6)