

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
SUMMIT UTILITIES OKLAHOMA, INC., FOR)
APPROVAL OF ITS PERFORMANCE-BASED)
RATE CHANGE PLAN CALCULATIONS FOR)
THE TWELVE MONTHS ENDED DECEMBER)
31, 2021)

CAUSE NO. PUD 202 200022

FILED
MAR 15 2022

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

DIRECT TESTIMONY

OF

BURL M. DREWS

REGULATORY MANAGER

ON BEHALF OF

SUMMIT UTILITIES OKLAHOMA, INC.

Filed: March 15, 2022

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LIST OF EXHIBITS

DIRECT EXHIBIT BMD-1

PBRC Plan Calculations Appendix 1 and
Appendix 2.

EXECUTIVE SUMMARY

My name is Burl M. Drews. I am a Regulatory Manager for CenterPoint Energy Service Company testifying on behalf of Summit Utilities Oklahoma, Inc. (“Summit Oklahoma” or “SUO”). I am an economist with over 30 years of utility industry experience. I have previously filed testimony with the Oklahoma Corporation Commission (“Commission”) and the regulatory commissions of Minnesota, Texas, and Arkansas.

The proposed PBRC Plan calculations show an adjusted net income of approximately \$4.9 million and an adjusted earned return on equity of 10.15% for the 2021 Test-Year. An adjusted earned return on equity of 10.15% results in no change of revenues and rates. The Asset Management Agreements (“AMA”) delivered direct financial benefits of approximately \$470,000 to customers for the 2021 Test-Year.

According to the PBRC Plan, certain Energy Efficiency rate adjustments are to be implemented in connection with the annual PBRC Plan filing. Accordingly, my testimony presents annual True-up Adjustment and a Utility Incentive Adjustment. These adjustments result in changes to base rates in the amount of \$0.0239/Ccf for the Residential class, \$0.0186/Ccf for the General Service class, \$0.0259/Ccf for the Commercial Service class sales service customers, \$0.2494/MMBtu for the Commercial Service class transportation service customers, and (\$0.4553)/MMBtu for the Large Commercial Service customers who choose to participate in the energy efficiency program. The Energy Efficiency rate adjustments are not applicable to the Commercial NGV rate class or to the Large Commercial Service sales customers.

I recommend the Commission approve:

1. the PBRC Plan Appendix 1 calculations resulting in no change to revenues or rates;

2. the PBRC Plan Appendix 2 Energy Efficiency calculations and resulting adjustments to base rates; and
3. the treatment of the residual amounts remaining from the 2019 Test-Year refund.

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

3 A. My name is Burl M. Drews. I am a Regulatory Manager for CenterPoint Energy Service
4 Company, LLC (“CESC”). My business address is 1111 Louisiana St., Houston, Texas
5 77002.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

7 A. I am testifying on behalf of Summit Utilities Oklahoma, Inc. (“Summit Oklahoma” or
8 “SUO”). I am providing this testimony pursuant to the Transition Services Agreement
9 (“TSA”) under which CESC will provide to SUO certain transition services for a 12-
10 month period after the purchase of the Oklahoma jurisdiction assets by SUO from
11 CenterPoint Energy Resources Corp. was finalized. Services provided to SUO pursuant
12 to the TSA include operational support in regulatory services in addition to other areas.¹

13 **Q. BRIEFLY STATE YOUR EDUCATIONAL AND PROFESSIONAL**
14 **EXPERIENCE AND QUALIFICATIONS.**

15 A. I received Bachelor of Science and Master of Arts degrees in Economics from the
16 University of Houston in 1985 and 1987, respectively.

17 I have held numerous positions in various areas within CenterPoint Energy
18 Service Company, LLC, including its predecessors and affiliates, from 1988 to 2002,
19 including positions in Corporate Planning, Strategic Management, Strategic Planning,
20 Regulatory Planning, and Retail Planning and Accounting. From 2002-2004, I was the
21 Manager, Financial Planning and Analysis at Reliant Energy, Inc., in the Retail Group’s
22 Planning and Accounting Department. From 2004-2005 and then from 2006-2007, I

¹ Cause No. PUD 202100114, Final Order No. 721657, Findings of Fact 9-11 of the adopted Administrative Law Judge Report.

1 worked as a contractor assisting CenterPoint Energy Service Company, LLC, in various
2 regulatory proceedings for CenterPoint Energy Houston Electric, LLC. In September
3 2007, I rejoined CenterPoint Energy Service Company, LLC as an Economic Research
4 Coordinator and was promoted to Administrator – Regulatory Activities in 2011. I am
5 responsible for conducting financial analyses, class cost of service studies, billing
6 determinant forecasts, and rate design.

7 I have previously filed testimony before the Minnesota Public Utilities
8 Commission in Docket Nos. G-008/GR-08-1075, G-008/GR-13-316,
9 G-008/GR-15-424, G-008/GR-17-285, the Railroad Commission of Texas in GUD Nos.
10 10038, 10182, 10432, 10567, 10669, 10920, the Oklahoma Corporation Commission
11 (“Commission”) in Cause Nos. PUD 201500118, 201600094, 201700078, 201700499,
12 201800029, 201900019, 202000028, 202100054, and the Arkansas Public Service
13 Commission in Docket Nos. 10-108-U, 15-098-U, 17-006-TF, 17-010-FR, 18-020-TF,
14 18-050-TF, 19-001-TF, and 21-044-U.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

16 A. The purpose of my testimony is to:

- 17 1) provide an overview of the PBRC Plan;
- 18 2) present the earned return on equity result of the PBRC Plan calculations and any
19 resulting required revenue and rate changes for the 2021 Test-Year; and
- 20 3) present the base rate adjustments resulting from the Energy Efficiency (“EE”)
21 incentive and true-up shown on PBRC Plan Appendix 2.

22 In addition, I sponsor Exhibit BMD-1 – PBRC Plan Calculations Appendix 1 and
23 Appendix 2.

1 **II. PBRC PLAN BACKGROUND**

2 **Q. WHAT ARE THE MAJOR PROVISIONS OF THE PBRC PLAN?**

3 A. The PBRC Plan is a mechanism that provides for the annual review and adjustment of
4 revenues depending on actual operating results, with certain specified adjustments, as
5 measured by return on equity (“ROE”) for the most recent calendar year. Revenues may
6 be increased, decreased, or remain unchanged based upon the revenue requirements
7 determined using certain limited adjustments to actual operating results. The PBRC
8 Plan calculations in this proceeding are based upon the 2021 Test-Year, which is the
9 twelve-month period ending December 31, 2021.

10 Summit Oklahoma must file with the Commission, on or before March 15th of
11 each year, the calculations and schedules specified in its PBRC Plan to determine if
12 SUO’s revenues should be increased, decreased, or remain unchanged. These test-year
13 calculations are to reflect actual operating results with limited adjustments specified in
14 the PBRC Plan.

15 These calculations result in an earned return on equity (“ER”) that is compared
16 to the allowed return on equity (“AR”) of 10.00%. If the ER is within a 100 basis point
17 dead-band around the AR, i.e. between 9.50% and 10.50%, then revenues do not change.
18 If the calculated ER is less than 9.50%, then revenues increase to prospectively target
19 the Company’s AR of 10.00%. If the ER is greater than 10.50%, then a credit is
20 provided to customers. The aggregate amount of the credit to customers is equal to 75%
21 of the amount of earnings greater than 10.50% adjusted so that SUO shall not share in
22 the customer’s portion of any Asset Management Agreement (“AMA”) revenues.
23 According to the PBRC Plan, any revenue increase or refund to customers resulting

1 from this year’s filing must be apportioned 70% to the Residential (RS-1) class, 14% to
2 the General Service (GS-1) class, 13% to the Commercial Service (CS-1 and CS-NGV)
3 classes, and the remaining 3% to the Large Commercial Service (LCS-1) class.

4 Paragraph 5.5 of the PBRC Plan requires SUO to file calculations to adjust its
5 base rates for its Utility Incentive Adjustment and True-up Adjustment associated with
6 SUO’s EE programs.

7 Additionally, Paragraph 5.6 of the PBRC Plan requires SUO to provide an
8 annual credit once per year for the return of the Excess Deferred Income Tax (“EDIT”)
9 resulting from the Tax Cuts and Jobs Act of 2017 (“TCJA”).

10 **III. PBRC PLAN CALCULATIONS AND RESULTS**

11 **Q. WOULD YOU PLEASE DISCUSS THE 2021 TEST-YEAR DATA USED FOR**
12 **THE PBRC PLAN CALCULATIONS IN THIS PROCEEDING?**

13 A. Yes. The PBRC Plan Appendix 1 calculations are based upon the per book amounts for
14 the twelve-months ending December 31, 2021. The 2021 Test-Year per book amounts
15 were adjusted as specified in Paragraphs 5.3.7 (b) through (f) of the tariff for adjustments
16 customarily made for ratemaking purposes and for amounts being collected through
17 separate riders. They were also adjusted for the impact of the EDIT Credit being
18 returned to customers as described in Paragraph 5.6. The individual adjustments to the
19 Test-Year operating results can be seen on Schedules B-2, B-3, H-2, and H-3 of Exhibit
20 BMD-1.

1 **Q. WERE THERE ANY CHANGES IN ACCOUNTING POLICIES, PRACTICES,**
2 **OR PROCEDURES DURING THE 2021 TEST-YEAR?**

3 A. Yes. There was a change regarding the accounting of Administrative and General
4 (“A&G”) Overhead (“OH”) spending. During 2020, an analysis of whether an
5 accounting change was warranted for A&G OH was begun. Pursuant to this analysis, it
6 was determined that certain Administrative and General functions within the
7 organization were supporting capital work and consequently, the cost of that time should
8 be included as a capital overhead.

9 **Q. WHAT OPERATING INCOME AND EARNED RETURN ON EQUITY**
10 **RESULT FROM THIS PROCEEDING’S PBRC PLAN CALCULATIONS?**

11 A. The operating income and ER resulting from the PBRC Plan calculations are shown on
12 Schedule H-1 of Exhibit BMD-1. The unadjusted net operating income is \$3,164,062
13 and the corresponding ER is 6.56%. After making certain adjustments as provided for
14 in Rider Schedule No. 5 to the 2021 Test-Year per books operating results, the adjusted
15 net operating income is \$4,877,277 and the adjusted ER is 10.15%.

16 **Q. DOES AN ADJUSTED EARNED RETURN OF 10.15% REQUIRE A**
17 **PERFORMANCE-BASED CHANGE IN REVENUES?**

18 A. No. Pursuant to Paragraph 5.3.2 (b) of the PBRC Plan, if the Company’s adjusted ER
19 is greater than 9.5% and less than 10.5%, then no revenue or rate change is required.

20 **Q. WHAT WAS THE EFFECT OF THE ASSET MANAGEMENT AGREEMENT**
21 **ON THE COMPANY’S PBRC PLAN CALCULATIONS FOR THE 2021 TEST-**
22 **YEAR?**

1 A. The AMA delivered direct financial benefits of approximately \$470,000 to customers
2 for the 2021 Test-Year. These benefits arise from two components. First, as a result of
3 the AMA, the amount of gas-in-storage included in rate base was reduced during the
4 2021 Test-Year, thereby decreasing revenue requirements, and thus decreasing the
5 amount to be collected from customers. Second, the AMA contributed to the PBRC Plan
6 revenues, thus increasing operating income. While AMAs consistently provide direct
7 benefits to customers year after year, the level of those benefits can vary depending on
8 the cost of gas prevalent during the Test-Year. It should be noted that implementing an
9 AMA is strictly voluntary and not required by the Commission.

10 **Q. BY HOW MUCH HAVE CUSTOMERS BENEFITED FROM THE FIVE AMAs**
11 **IMPLEMENTED BY SUO AND ITS PREDECESSOR, CERC, AND AS A**
12 **RESULT SAVED CUSTOMERS MONEY?**

13 A. Through the 2021 PBRC Plan Test-Year, customers have received direct financial
14 benefits of over \$6 million from the five AMAs. These customer benefits are solely due
15 to the voluntary actions taken to benefit both the Company's customers and itself. The
16 PBRC Plan has been integral to customers receiving these benefits.

17 **Q. DID INVESTMENT IN THE SAFETY AND RELIABILITY OF THE**
18 **OKLAHOMA DISTRIBUTION SYSTEM CONTINUE IN THE TEST-YEAR?**

19 A. Yes. Significant investments were made during 2021 in the Oklahoma distribution
20 system to continue to provide safe and reliable natural gas service to customers. During
21 2021, approximately \$7.7 million of distribution mains were added or replaced within
22 the Oklahoma distribution system, with approximately \$5.1 million of that amount
23 related to system improvement/integrity management, approximately \$1.9 million for

1 customer additions, and approximately \$0.75 million for public improvements. This
2 infrastructure investment benefits customers because it results in more efficient, safe,
3 and reliable natural gas service. Additional discussion of the 2021 capital spending can
4 be found in the direct testimony of Mr. True.

5 **Q. WERE ADJUSTED OPERATIONS EXPENSES WELL CONTROLLED**
6 **DURING THE 2021 TEST-YEAR?**

7 A. Yes. Adjusted operations expenses, which include the costs to manage, operate,
8 maintain, and support Oklahoma’s distribution system and customers, decreased during
9 the 2021 Test-Year. The 2021 adjusted operations expenses were \$346,692 or 1.4%
10 lower during the 2021 Test-Year than the 2020 Test-Year.²

11 **Q. ARE THE 2021 TEST-YEAR TOTAL COMPENSATION EXPENSES**
12 **INCLUDING INCENTIVE COMPENSATION INCLUDED IN THE PBRC**
13 **PLAN REASONABLE?**

14 A. Yes. The level of total compensation expense is reasonable and has been continually
15 reviewed to maintain a level that is market-based and competitive with peer companies.
16 The included compensation expenses follow a compensation philosophy that is focused
17 on maintaining the competitiveness of the compensation plans and levels as measured
18 from a “total compensation” perspective. That is, the value of all of the components
19 that make up employees’ total compensation (meaning base pay, incentive
20 compensation, and benefits) is measured and compared against competitor companies
21 to ensure that the compensation plans and levels are sufficient to recruit, retain, and
22 motivate the quality workforce and leadership needed to serve customers. The objective

² 2021 Test-Year adjusted operations expense of \$24,111,965 compared to 2020 Test-Year adjusted operations expense of \$24,458,657.

1 of this approach is to approximate the median (50th percentile) of the market for total
2 compensation as represented by the companies included in the market compensation
3 surveys or studies used to assess the competitiveness of the compensation and benefits.
4 In summary, the overall level of compensation including incentive compensation, both
5 long-term and short-term, is reasonable, market-based, and necessary to attract, retain,
6 and motivate qualified employees required to provide safe and reliable natural gas
7 service to customers.

8 **IV. EE INCENTIVE AND TRUE-UP**

9 **Q. HOW MUCH ARE THE ADJUSTMENTS TO BASE RATES FOR THE EE**
10 **INCENTIVE AND TRUE-UP ADJUSTMENTS?**

11 A. The adjustments to base rates by rate class are:

- 12 • RS-1 \$0.0239 per Ccf
- 13 • GS-1 \$0.0186 per Ccf
- 14 • CS-1 \$0.0259 per Ccf Sales Service
- 15 • CS-1 \$0.2494 per MMBtu Transportation Service
- 16 • LCS-1 (\$0.4553) per MMBtu

17 Note that the EE adjustments listed above will not apply to the CS-NGV rate class nor
18 LCS-1 sales customers as the Company offers no EE programs applicable to those
19 customers.³

20 **Q. PLEASE DISCUSS THE CALCULATION CHANGE IN THE INCENTIVE**
21 **TRUE-UP (OVER)/UNDER COMPONENT TO THE EE INCENTIVE AND**
22 **TRUE-UP ADJUSTMENT TO BASE RATES?**

³ Pursuant to Order No. 706092 in Cause No. 201900060, the Company is not required to provide EE programs to the LCS-1 customer class.

1 A. While doing a review of the incentive true-up (over)/under component of the EE
2 Incentive and True-Up Adjustment Rates, the Company determined that there was
3 formula error in the calculation. Due to some components of the original calculation
4 being on a lag, it was determined that formula was missing a required component. The
5 proposed solution allows the lag to balance out before incorporating the missing
6 component to the new calculation.

7 **V. MISCELLANEOUS ISSUES**

8 **Q. DO THE PBRC PLAN CALCULATIONS COMPLY WITH THE JOINT**
9 **STIPULATION AND SETTLEMENT AGREEMENT APPROVED IN CAUSE**
10 **NO. PUD 202000028 REGARDING AMORTIZATION OF A LEGAL**
11 **SETTLEMENT EXPENSE THAT OCCURRED IN THE 2019 TEST-YEAR?**

12 A. Yes. Per the Joint Stipulation and Settlement Agreement the PBRC Plan calculations
13 include \$71,833, one year's amortization, in the 2021 Test-Year PBRC Plan expenses.
14 This completes the amortization of the legal settlement expense.

15 **Q. HAS THE COMPANY FULLY CREDITED TO CUSTOMERS THE 2019 TEST-**
16 **YEAR REFUND ORDERED IN CAUSE NO. PUD 202000028?**

17 A. Pursuant to the final order in Cause No. PUD 202000028, the Company initiated refunds
18 in the aggregate amount of \$2,460,000 from July 2020 through July 2021. In the course
19 of refunding the ordered amount, the Company over-refunded to the RS-1, GS-1, and
20 LCS-1 classes and under-refunded to the CS-1 class for an aggregate over-refund of
21 \$79,075.97. The residual amounts to be refunded or collected by rate class are:

- 22 • RS-1 \$84,551.67 to be collected
- 23 • GS-1 \$7,983.53 to be collected

- 1 • CS-1 \$13,573.35 to be refunded
- 2 • LCS-1 \$114.12 to be collected

3 **Q. HOW DOES THE COMPANY PROPOSE TO REFUND OR COLLECT THE**
4 **RESIDUAL AMOUNTS REMAINING FROM THE 2019 TEST-YEAR REFUND**
5 **ORDERED IN CAUSE NO. PUD 202000028?**

6 A. Summit Oklahoma proposes to add the amounts for the RS-1 and GS-1 classes to the
7 Gas Supply Rate (“GSR”) balance that will be included in Summit Oklahoma’s October
8 2022 GSR submittal. The Company proposes to allocate the amounts by class for the
9 CS-1 (inclusive of the CS-NGV class) and the LCS-1 classes between the sales service
10 and transportation service customers based on the percentage of base revenues collected
11 from the respective classes and customer types during the original refund period. Then
12 the amounts allocated to the CS-1 and LCS-1 sales service customers will be
13 incorporated into the GSR balance, while the amounts allocated to the transportation
14 service customers will be refunded or surcharged by class with a one-time charge in an
15 equal amount per customer for that class.

16 **VI. CONCLUSION**

17 **Q. PLEASE SUMMARIZE YOUR DIRECT TESTIMONY.**

18 A. In my testimony, I discuss the current PBRC Plan filing including the adjustments made
19 to the 2021 Test-Year operating results, the calculations made using the adjusted Test-
20 Year data, and the results of those calculations. Specifically, the adjusted ER falls within
21 the ROE dead-band around the AR resulting in no change in revenues. I present the
22 adjustment to base rates required due to the EE Plan incentive and true-up adjustments.

23 **Q. WHAT ARE YOUR RECOMMENDATIONS?**

1 A. I recommend the Commission approve:

- 2 1. the PBRC Plan Appendix 1 calculations resulting in no change to
3 revenues or rates;
- 4 2. the PBRC Plan Appendix 2 Energy Efficiency calculations and resulting
5 adjustments to base rates; and
- 6 3. the treatment of the residual amounts remaining from the 2019 Test-Year
7 refund.

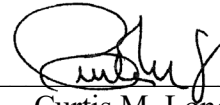
CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March, 2022, a full, true, and correct copy of the above and foregoing instrument was served on the following persons by **ELECTRONIC MAIL** and by **UNITED STATES CERTIFIED MAIL**, postage prepaid to:

Brandy L. Wreath
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Curtis M. Long

Summit Utilities Oklahoma, Inc.
 Oklahoma Division
 PBRC Revenue Requirement
 Test Year Ended December 31, 2021

Line No.	Description	[A] Company Amount	[B] Adjustments	[C] PBRC Adjusted Amount
1	Rate Base	\$ 87,710,988	\$ (238,122)	\$ 87,472,866
2	Rate of Return	7.92%		7.92%
3	Operating Income Required (Line 1 x line 2)	\$ 6,942,991		\$ 6,924,142
4	Actual Operating Income	\$ 7,559,829	\$ (635,687)	\$ 6,924,142
5	Return Excess (Deficiency) (Line 4 - Line 3)	\$ 616,838		\$ -
6	Income Tax Gross-Up Factor	1.3466		1.3466
7	Calculated Base Rate Revenue (Deficiency)	\$ 830,634		\$ - ✓
8	PBRC Distribution to Ratepayers (75%) + AMA Revenue			\$ -
9	PBRC Distribution to Company (25%)			0
Revenue Requirement				
10	Return Requirement (Line 3)	\$ 6,942,991		\$ 6,924,142
11	Income Tax Gross Up (Line 5 - Line 7)	\$ (213,796)		\$ -
12	Expenses	\$ 75,267,470	\$ (35,968,292)	\$ 39,299,178
13	Base Rate Revenue Requirement (Line 10 + 11 + 12)	\$ 81,996,665		\$ 46,223,320

- From:**
- ① Schedule B-1
 - ② Schedule F-1
 - ③ Schedule H-1

- To:**
- ④ Worksheet Calculation of O(U) Earnings

✓ Ties to Over / (Under) Earnings on Worksheet Calculation of O(U) Earnings

Summit Utilities Oklahoma, Inc.
Oklahoma Division
PBRC Rate Base
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Summit Utilities PBRC Rate Base	[C] Total Adjustments	[D] = [B] + [C] PBRC Rate Base
Plant in Service:				
1	Plant in Service	① \$ 236,805,799 ⑫	\$ -	\$ 236,805,799
2	Construction Work in Progress	↓ 6,159,725 ↓	-	6,159,725
3	Less: Accumulated Depreciation	↓ (133,673,293) ↓	-	(133,673,293)
4	Net Plant	\$ 109,292,231	\$ -	\$ 109,292,231
Other Rate Base Investments:				
5	Prepayments - Gas	② \$ 242,525 ⑫	\$ -	\$ 242,525
6	Materials & Supplies	③ 753,017 ↓	-	753,017
7	Current Gas in Storage	④ 1,453,356 ↓	-	1,453,356
8	Other Regulatory Assets (2)	⑩ 238,122 ↓ ⑨	(238,122)	-
9	Total Investment	\$ 111,979,251	\$ (238,122)	\$ 111,741,129
Deductions:				
10	Customer Deposits	⑤ \$ (1,814,773) ⑫	\$ -	\$ (1,814,773)
11	Customer Advances	⑥ - ↓	-	-
12	ACC Deferred Income Tax	⑦ (15,091,286) ↓ ⑨	-	(15,091,286)
13	Other Regulatory Liabilities (1)	⑧ (7,362,204) ↓	-	(7,362,204)
14	Total Rate Base	\$ 87,710,988	\$ (238,122)	\$ 87,472,866 ⑪

Notes

- (1) Other Regulatory Liabilities contains the net EDIT Regulatory Asset and Liability balances as of December 2021.
(2) Other Regulatory Assets include the COVID-19 Bad Debt deferral as of December 2021

From:

- ① OK 2021 Plant & Reserve
- ② OK 2021 Prepayments
- ③ OK 2021 Materials and Supplies
- ④ OK 2021 Storage Gas
- ⑤ OK 2021 Customer Deposits
- ⑥ OK 2021 Customer Advances
- ⑦ OK 2021 ADIT
- ⑧ OK 2021 Regulatory Liability for Excess Deferred Income Taxes
- ⑨ Schedule B-2
- ⑩ OK 2021 COVID-19 Regulatory Asset

To:

- ⑪ Schedules A-1 and J-2
- ⑫ Schedule B-2

Summit Utilities Oklahoma, Inc.
Oklahoma Division
PBRC Adjustments to Rate Base
Test Year Ended December 31, 2021

	[A]	[C]	[C]	[D]	[D]	[E]	[F]
Line No. Description	Total Summit Utilities Base	Regulatory Asset / Liability Adj No. 1	ACC Deferred Income Tax Adj No. 2	Regulatory Asset Adj No. 3	Total Adjustments	PBRC Rate Base	
Plant in Service:							
1 Plant in Service	\$ 236,805,799	\$ -	\$ -	\$ -	\$ -	\$ 236,805,799	
2 Construction Work in Progress	6,159,725	-	-	-	-	6,159,725	
3 Less: Accumulated Depreciation	(133,673,293)	-	-	-	-	(133,673,293)	
4 Net Plant	\$ 109,292,231	\$ -	\$ -	\$ -	\$ -	\$ 109,292,231	
Other Rate Base Investments:							
5 Prepayments - Gas	\$ 242,525	\$ -	\$ -	\$ -	\$ -	\$ 242,525	
6 Materials & Supplies	753,017	-	-	-	-	753,017	
7 Current Gas in Storage	1,453,356	-	-	-	-	1,453,356	
8 Other Regulatory Assets	238,122	-	-	(238,122)	(238,122)	-	
9 Total Investment	\$ 111,979,251	\$ -	\$ -	\$ (238,122)	\$ (238,122)	\$ 111,741,129	
Deductions:							
10 Customer Deposits	\$ (1,814,773)	\$ -	\$ -	\$ -	\$ -	\$ (1,814,773)	
11 Customer Advances	-	-	-	-	-	-	
12 ACC Deferred Income Tax	(15,091,286)	-	-	-	-	(15,091,286)	
13 Other Regulatory Liabilities	(7,362,204)	-	-	-	-	(7,362,204)	
14 Total Rate Base	\$ 87,710,988	\$ -	\$ -	\$ (238,122)	\$ (238,122)	\$ 87,472,866	

From:

- 1 Schedule B-1
- 2 OK 2021 Regulatory Liability for Excess Deferred Income Taxes
- 3 OK 2021 COVID-19 Regulatory Asset

To:

- 4 Schedule B-1

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Explanation of PBRC Adjustments to the Rate Base
Test Year Ended December 31, 2021

Adj. No.	Adjustment Description	Impact on Rate Base	
		[A] Increase	[B] (Decrease)
B-1	2021 Amortization of Regulatory Asset / Liability	\$ -	\$ -
B-2	ACC Deferred Income Tax Adjustment	-	
B-3	COVID-19 Regulatory Asset		(238,122)
	Total	<u>\$ -</u>	<u>\$ (238,122)</u>

From:
 ① Schedule B-2

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Capital Structure
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Capitalization Ratios	[C] Cost of Capital	[D] Weighted Cost of Capital	[E] Income Tax Gross Up Factor	[F] Weighted Cost of Capital With Income Tax
I Allowed Return on Equity based on PBRC Tariff						
1	Long Term Debt	45.00%	② 5.21%	2.34%	③ 1.00000	2.34%
	Equity:					
2	Equity Units	0.040%	4.90%	0.00%	1.34660	0.00%
3	Common Stock	<u>54.96%</u>	10.00%	<u>5.50%</u>	1.34660	<u>7.41%</u>
4	Total	100.00%		<u>7.84%</u> ④		9.75%
II Maximum Allowed Return on Equity based on PBRC Tariff						
1	Long Term Debt	45.00%	5.21%	2.34%	1.00000	2.34%
	Equity:					
2	Equity Units	0.040%	4.90%	0.00%	1.34660	0.00%
3	Common Stock	<u>54.96%</u>	10.50%	<u>5.77%</u>	1.34660	<u>7.77%</u>
4	Total	100.00%		<u>8.11%</u>		10.11%
III Calculation of Earned Return on Equity (ER)						
1	Long Term Debt	45.00%	5.21%	2.34%	1.00000	2.34%
	Equity:					
2	Equity Units	0.040%	4.90%	0.00%	1.34660	0.00%
3	Common Stock	<u>54.96%</u> ①	<u>10.15%</u>	<u>5.58%</u>	1.34660	<u>7.51%</u>
4	Total	100.00%		7.92% ✓		9.85%
		From:			To:	
		① Schedule H-1			③ Schedule J-2	
		② PBRC Tariff - PBRC 2021			④ Schedule A-1	

✓ Equals total operating income, with adjustments / total rate base, with adjustments

Summit Utilities Oklahoma, Inc.
Oklahoma Division
PBRC Operating Income Statement
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Summit Utilities PBRC Income Statement	[C] Total Adjustments	[D] Total Income Statement	[E] Authorized Rate Change per PBRC	[F] = [D] + [E] PBRC Results
Operating Revenues:						
1	Residential	\$ 53,163,415	\$ (22,184,145)	\$ 30,979,270	\$ -	\$ 30,979,270
2	Commercial/Industrial	23,469,633	(12,049,334)	11,420,299	-	11,420,299
3	Transportation Revenues	3,916,914	(1,173,879)	2,743,035	-	2,743,035
4	Sub Total	\$ 80,549,962	\$ (35,407,358)	\$ 45,142,604	\$ -	\$ 45,142,604
Other Utility Revenues:						
5	Gas Forfeited Discounts	\$ 211,200	\$ -	\$ 211,200	\$ -	\$ 211,200
6	Misc Gas Service Revenues	728,850	-	728,850	-	728,850
7	Other Gas Revenues	1,337,287	(1,196,621)	140,666	-	140,666
8	Sub Total	\$ 2,277,337	\$ (1,196,621)	\$ 1,080,716	\$ -	\$ 1,080,716
9	Total Operating Revenue	\$ 82,827,299	\$ (36,603,979)	\$ 46,223,320	\$ -	\$ 46,223,320
Operating Expenses						
10	Cost of Gas	\$ 33,159,385	\$ (33,159,385)	\$ -	\$ -	\$ -
11	Operations Expenses	26,446,447	(2,334,482)	24,111,965	-	24,111,965
12	Depreciation and Amortization Expense	10,767,788	(538)	10,767,250	-	10,767,250
13	Taxes Other Than Income Taxes	4,276,751	(1,547,349)	2,729,402	-	2,729,402
14	Income Tax	617,099	1,073,462	1,690,561	-	1,690,561
15	Total Operating Expenses	\$ 75,267,470	\$ (35,968,292)	\$ 39,299,178	\$ -	\$ 39,299,178
16	Operating Income:	\$ 7,559,829	\$ (635,687)	\$ 6,924,142	\$ -	\$ 6,924,142
17	Interest Cost	4,395,767	(2,348,902)	2,046,865	-	2,046,865
18	Net Operating Income	\$ 3,164,062	\$ 1,713,215	\$ 4,877,277	\$ -	\$ 4,877,277
19	Total Equity	\$ 48,205,959		\$ 48,075,087		\$ 48,075,087
20	Return on Equity (Line 18 / Line 19)	6.56%		10.15%		10.15%

From:

- 1 OK 2021 Income Statement by FERC
- 2 Schedule J-1
- 3 Schedule J-2
- 4 Worksheet Calculation of O(U) Earnings
- 5 Schedule H-2

To:

- 6 Schedule H-2
- 7 Worksheet Calculation of O(U) Earnings
- 8 Schedule A-1
- 9 Schedule F-1

- ✓1 Calculated as the total Rate Base from Schedule B-1 multiplied by the ratio of common stock in the capital structure Schedule F-1
- ✓2 Agrees to Grand Total on schedule H-3

Summit Utilities Oklahoma, Inc.
Oklahoma Division
PBRC Operating Income Statement Adjustments
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Summit Utilities PBRC Income Statement	[C] EDIT Refunds/Gas Cost/GR Rev Adjustment No.1	[D] Energy Efficiency Adjustment No.2	[E] Tax Assess. Rev Adjustment No.3	[F] Cost of Gas Adjustment No.4	[G] Wage Adjustment No.5	[H] Savings Plan Adjustment No.6
Operating Revenues:								
1	Residential	\$ 53,163,415	\$ (21,470,898)	\$ (587,386)	\$ (125,861)	\$ -	\$ -	\$ -
2	Commercial/Industrial	23,469,633	(11,879,914)	(156,972)	(12,448)	-	-	-
3	Transportation Revenues	3,916,914	(836,231)	(337,558)	(90)	-	-	-
4	Sub Total	\$ 80,549,962	\$ (34,187,043)	\$ (1,081,916)	\$ (138,399)	\$ -	\$ -	\$ -
Other Utility Revenues:								
5	Gas Forfeited Discounts	\$ 211,200	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6	Gas Misc Service Revenue	728,850	-	-	-	-	-	-
7	Other Gas Revenues	1,337,287	-	(1,196,621)	-	-	-	-
8	Sub Total	\$ 2,277,337	\$ -	\$ (1,196,621)	\$ -	\$ -	\$ -	\$ -
9	Total Operating Revenue	\$ 82,827,299	\$ (34,187,043)	\$ (2,278,537)	\$ (138,399)	\$ -	\$ -	\$ -
Operating Expenses								
10	Cost of Gas	\$ 33,159,385	\$ -	\$ -	\$ -	\$ (33,159,385)	\$ -	\$ -
11	Operations Expenses	26,446,447	-	(2,092,773)	-	-	(125,998)	(6,856)
12	Depreciation and Amortization Expense	10,767,788	-	(538)	-	-	-	-
13	Taxes Other Than Income Taxes	4,276,751	-	(12,763)	-	-	22,024	-
14	Income Tax	617,099	-	-	-	-	-	-
15	Total Operating Expenses	\$ 75,267,470	\$ -	\$ (2,106,074)	\$ -	\$ (33,159,385)	\$ (103,974)	\$ (6,856)

- From:**
- 1 Schedule H-1
 - 2 OK 2021 Income Statement by FERC
 - 3 OK 2021 EDIT Refund, Gas Cost, & GR Tax Revenue Adj
 - 4 OK 2021 Energy Efficiency Program Adj
 - 5 OK 2021 PUD Tax Assessment Fee Revenue Adjustment
 - 6 OK 2021 Cost of Gas Expense Adjustment
 - 7 OK 2021 Wage Adjustment

Summit Utilities Oklahoma, Inc.
 Oklahoma Division
 PBRC Operating Income Statement Adjustments
 Test Year Ended December 31, 2021

Line No.	Description	[A]	[I]	[J]	[K]	[L]	[M]	[N]	[Q]	[R]	[S]	[T]
		Post Retirement Adjustment No.7	Cust. Dep. Int. Adjustment No.8	GR Tax Exp. Adjustment No.9	Tax Assess. Fee Adjustment No.10	Contributions Exp Adjustment No.11	Legislative Exp Adjustment No.12	EDIT Amortization Expense Adjustment No.15	Income Taxes Adjustment No.16	Total Adjustments	PBRC Income Statement	
Operating Revenues:												
1	Residential	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (22,184,145)	\$ 30,979,270	
2	Commercial/Industrial	-	-	-	-	-	-	-	-	(12,049,334)	11,420,299	
3	Transportation Revenues	-	-	-	-	-	-	-	-	(1,173,879)	2,743,035	
4	Sub Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (35,407,358)	\$ 45,142,604	
Other Utility Revenues:												
5	Gas Forfeited Discounts	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 211,200	
6	Gas Misc Service Revenue	-	-	-	-	-	-	-	-	-	728,850	
7	Other Gas Revenues	-	-	-	-	-	-	-	-	(1,196,621)	140,666	
8	Sub Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,196,621)	\$ 1,080,716	
9	Total Operating Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (36,603,979)	\$ 46,223,320	
Operating Expenses												
10	Cost of Gas	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (33,159,385)	\$ -	
11	Operations Expenses	(43,099)	(50,787)	-	-	(7,045)	(7,924)	-	-	(2,334,482)	24,111,965	
12	Depreciation and Amortization Expense	-	-	-	-	-	-	-	-	(538)	10,767,250	
13	Taxes Other Than Income Taxes	-	-	(1,426,236)	(130,374)	-	-	-	-	(1,547,349)	2,729,402	
14	Income Tax	-	-	-	-	-	-	566,855	506,607	1,073,462	1,690,561	
15	Total Operating Expenses	\$ (43,099)	\$ (50,787)	\$ (1,426,236)	\$ (130,374)	\$ (7,045)	\$ (7,924)	\$ 566,855	\$ 506,607	\$ (35,968,292)	\$ 39,299,178	

From:

- 8 OK 2021 Savings Adjustment
- 9 OK 2021 Post Retirement Adjustment
- 10 OK 2021 Interest Expense on Customer Deposits Adjustment
- 11 OK 2021 GR Tax Expense Adjustment
- 12 OK 2021 PUD Tax Assessment Fee Expense Adjustment
- 13 OK 2021 Contributions Expenses Adj
- 14 OK 2021 Legislative Activities Expense Adj

From:

Schedule J-1

To:

- A Schedule H-1
- B Schedule H-3

\$ (635,687)

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Explanation of PBRC Adjustments to the Operating Income Statement
Test Year Ended December 31, 2021

Adj. No.	Adjustment Description	Impact on Net Operating Income	
		[A] Increase	[B] (Decrease)
H-1	EDIT Refunds, Gas Cost and GR Tax Revenue Adjustment		\$ (34,187,043)
H-2	Energy Efficiency Program	\$ 2,106,074	(2,278,537)
H-3	Tax Assessment Fees Revenue Adjustment		(138,399)
H-4	Gas Cost Adjustment	33,159,385	
H-5	Employee Wages, Salaries & Compensation Adjustment	103,974	
H-6	Savings Adjustment	6,856	
H-7	Post Retirement Adjustment	43,099	
H-8	Interest on Customer Deposits	50,787	
H-9	Gross Receipts Tax Adjustment	1,426,236	
H-10	Tax Assessment Fees Adjustment	130,374	
H-11	Contributions Expense Adjustment	7,045	
H-12	Legislative Activities Expense Adjustment	7,924	
H-15	EDIT Amortization Expense Adjustment		(566,855)
H-16	Associated Income Tax Adjustment		(506,607) ②
	Total	\$ 37,041,754	\$ (37,677,441)
	Total Net of Income Tax		\$ 437,775 ③
	Total Net Adjustments		\$ (635,687) ✓

✓ Agrees to Schedule H-1

From:
① Schedule H-2
② Schedule J-1

To:
③ Schedule J-1

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Pro Forma Calculation of Taxable Income
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Summit Utilities Results	[C] Test Year Adjustments	[D] Adjusted Results	[E] Recommended Increase	[F] Pro Forma Results
1	Operating Income Before Income Taxes	\$ 8,176,928	\$ 437,775	\$ 8,614,703	\$ -	\$ 8,614,703
2	Increase (Decrease) in Taxable Income Interest on Long Term Debt	\$ (4,395,767)	2,348,902	(2,046,865)	-	(2,046,865)
3	Subtotal	\$ 3,781,161	\$ 2,786,677	\$ 6,567,838	\$ -	\$ 6,567,838
4	Taxable Income			\$ 6,567,838	\$ -	\$ 6,567,838
5	State Effective Tax Rate			6.000%	6.000%	6.000%
6	State Income Tax (Line 4 * Line 5)	\$ 27,828	\$ 366,242	\$ 394,070	\$ -	\$ 394,070
7	Federal Taxable Income (Line 4 - Line 6)			\$ 6,173,768	\$ -	\$ 6,173,768
8	Federal Tax Rate			21.000%	21.000%	21.000%
9	Federal Income Tax (Line 7 * Line 8)	\$ 1,156,126	\$ 140,365	\$ 1,296,491	\$ -	\$ 1,296,491
10	Total Income Taxes (Line 6 + Line 9)	\$ 1,183,954	\$ 506,607	\$ 1,690,561	\$ -	\$ 1,690,561
11	Plus: Amortization	\$ (566,855)	\$ 566,855	\$ -	\$ -	\$ -
12	Total Income Taxes (Line 10 + Line 11)	\$ 617,099	\$ 1,073,462	\$ 1,690,561	\$ -	\$ 1,690,561

- From:**
- 1 OK 2021 Income Statement by FERC
 - 2 Worksheet Calculation of Over/(Under) Earnings
 - 3 Schedule J-2
 - 4 OK 2021 Detail Income Statement by GL
 - 5 Schedule H-3
 - 6 OK 2021 EDIT Amortization Adjustment

- To:**
- 7 Schedules H-1 and J-3
 - 8 Schedules H-2 and H-3
 - 9 Schedule H-1

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Interest Calculation
Test Year Ended December 31, 2021

Line No.	[A] Description	[B] Pro Forma
1	Rate Base	1 \$ 87,472,866
2	Weighted Cost of Debt	2 <u>2.34%</u>
3	Interest on Debt (Line 1 * Line 2)	<u>\$ 2,046,865</u> 3

From:
1 Schedule B-1
2 Schedule F-1

To:
3 Schedules H-1 and J-1

Summit Utilities Oklahoma, Inc.
Oklahoma Division
Adjustments to Current Taxable Income
Test Year Ended December 31, 2021

No.	[A] Description	[B] Increase	[C] Decrease
1	Adjustment to Synchronize Interest Expense with PBRC Rate Base Interest Expense	1 \$ 2,348,902	

From:
1 Schedule J-1

**Summit Utilities Oklahoma, Inc.
 Oklahoma Division
 Calculation of Over/(Under) Earnings
 Test Year Ended December 31, 2021**

Line No	[A] Description	[B] Amount
1	Maximum Revenue requirement	① \$ 46,223,320
2	Adjusted total Revenues	② \$ 46,223,320
3	Over/(Under) Earnings (line 2 less line 1)	\$ - ✓ ₁
4	Removal of AMA Revenues to Customer (Account 443045) if line 3 is > 0	\$ -
5	PBRC Over/(Under) Earnings (line 3 less line 4)	\$ -
6	PBRC distribution to Ratepayers (75%) (line 5 * .75)	0
7	PBRC distribution to Company (25%) (line 5 * .25)	0
8	Over/(Under) Earnings (line 6 + line 7)	\$ -
9	Addition of AMA Revenues to Customer (Account 443045)	-
10	Total distribution (PBRC + AMA) to Ratepayers (line 6 + line 9)	\$ - ✓ ₂
Allocation to Rate Customer Classes:		
11	Residential 70% (-line 3 * .70)	\$ - ③ ⑤
12	GS 14% (-line 3 * .14)	① \$ -
13	CS 13% (-line 3 * .13)	\$ -
14	LCS 3% (-line 3 * .03)	\$ -
15	Total Increase to Ratepayers	\$ - ④ ✓ ₂

From:
 ① Schedule A-1
 ② Schedule H-1

To:
 ③ Schedule H-1
 ④ Schedule J-1
 ⑤ Worksheet Tariff Calculation

Commercial / Industrial allocation ∑① \$ - ③

✓₁ Ties to Calculated Base Rate Revenue (Deficiency) on Schedule A-1
 ✓₂ Ties to Total Increase (Decrease) on Worksheet Tariff Calculation

Summit Utilities Oklahoma, Inc.
 Oklahoma Division
 Calculation of PBRC Plan - Credits for Tariff
 Test Year Ended December 31, 2021

Line No	[A] Description	[B]	[C]	[D]	[E]	[F] = [B] + [C] + [D] + [E]
		Residential RS-1	General Service GS-1	Commercial Service CS-1, CS-NGV, & TSO	Large Commercial Service LCS-1	Total
1	Change based on 2021 Test Year	\$ -	\$ -	\$ -	\$ -	\$ - ✓
2	50% in Monthly Customer Charge (Line 1 * 50%)	\$ -	\$ -	\$ -	\$ -	\$ -
3	# of Bills	1,059,797	111,979	14,637	288	
4	Increase per bill (Line 2 / Line 3)	\$ -	\$ -	\$ -	\$ -	
5	Effective Increase - Customer Charge (Line 3 * Line 4)	\$ -	\$ -	\$ -	\$ -	\$ -
6	Remaining Customer Charge Amount to be Collected through 1st Block (Line 2 - Line 5)	\$ -	\$ -	\$ -	\$ -	\$ -
7	50% in Commodity Rate of 1st Block (Line 1 - Line 2 + Line 6)	\$ -	\$ -	\$ -	\$ -	\$ -
8	Applicable Ccf in 1st Block	8,919,780	4,358,902	401,268	4,812,261	
9	Increase per Ccf in 1st Block (Line 7 / Line 8)	\$ -	\$ -	\$ -	\$ -	
10	Effective Increase - 1st Block (Line 8 x Line 9)	\$ -	\$ -	\$ -	\$ -	\$ -
11	Total Rate Increase Proof (Line 5 + Line 10)	\$ -	\$ -	\$ -	\$ -	\$ -
12	Excess/(Deficient) Revenue (Line 11 - Line 1)	\$ -	\$ -	\$ -	\$ -	\$ -

(A) LCS-1 volumes are total Mmbtu
 (B) CS-1 and CS-NGV volumetric charge for customers taking transportation service is billed in Mmbtu. The volumetric increase for these customers is \$0 per Mmbtu.

	Commercial Service CS-1 and CS-NGV
Sales rate increase	\$ -
mcf rate	\$ -
Btu factor	1.043
MMBtu rate increase	\$ -

From:
 1 Worksheet Calculation of O(U) Earnings
 2 Source: Rates

✓ Ties to Total Increase (Decrease) on Worksheet Calculation of O (U) Earnings

SUMMIT UTILITIES OKLAHOMA, INC.
Energy Efficiency
Test Year Ended December 31, 2021

Line No.	(A)	(B) TOTAL	(C) Res	(D) GS-1	(E) CS-1	(F) LCS-1
1	Budgeted Energy Efficiency Program Costs - Current Period	\$ 2,504,347	\$ 1,700,455	\$ 377,541	\$ 270,189	\$ 156,162
2	Projected Volumes - Ccf		45,460,003	9,395,719	20,751,845	
3	Projected Volumes - MMBtu				2,164,417	355,727
4	Current Year Unadjusted Rate - \$/Ccf		\$ 0.0374	\$ 0.0402	\$ 0.0130	
5	Current Year Unadjusted Rate - \$/MMBtu				\$ 0.1248	\$ 0.4390
6	Utility Incentive	\$ 211,139	\$ 131,795	\$ 22,687	\$ 39,141	\$ 17,516
7	New Incentive Rate - \$/Ccf		\$ 0.0029	\$ 0.0024	\$ 0.0019	\$ -
8	New Incentive Rate - \$/MMBtu				\$ 0.0181	\$ 0.0492
9	Prior Incentive Rate - \$/Ccf (Informational Only)		\$ 0.0022	\$ 0.0038	\$ 0.0011	\$ -
10	Prior Incentive Rate - \$/MMBtu (Informational Only)				\$ 0.0101	\$ 0.0144
11	Incentive True-up (Over)/Under	\$ 200,952	\$ 85,442	\$ 95,919	\$ 22,720	\$ (3,129)
12	New (Over)/Under Incentive Rate - \$/Ccf		\$ 0.0019	\$ 0.0102	\$ 0.0011	
13	New (Over)/Under Incentive Rate - \$/MMBtu				\$ 0.0105	\$ (0.0088)
14	Prior (Over)/Under Incentive Rate - \$/Ccf (Informational Only)		\$ (0.0040)	\$ (0.0040)	\$ (0.0047)	
15	Prior (Over)/Under Incentive Rate - \$/MMBtu (Informational Only)				\$ (0.0452)	\$ 0.0572
16	Program Costs True-up (Over)/Under	\$ 439,222	\$ 137,774	\$ 20,726	\$ 453,914	\$ (173,193)
17	New (Over)/Under Program Costs Rate - \$/Ccf		\$ 0.0030	\$ 0.0022	\$ 0.0219	
18	New (Over)/Under Program Costs Rate - \$/MMBtu				\$ 0.2097	\$ (0.4869)
19	Prior (Over)/Under Program Costs Rate (Informational Only) - \$/Ccf		\$ (0.0135)	\$ (0.0036)	\$ 0.0031	
20	Prior (Over)/Under Program Costs Rate (Informational Only) - \$/MMBtu				\$ 0.0294	\$ (0.0654)
21	Total Recoverable Energy Efficiency Amount	\$ 3,355,660	\$ 2,055,466	\$ 516,874	\$ 785,963	\$ (2,643)
22	New Total Effective Energy Efficiency Rate - \$/Ccf		\$ 0.0452	\$ 0.0550	\$ 0.0379	\$ -
23	New Total Effective Energy Efficiency Rate - \$/MMBtu				\$ 0.3631	\$ (0.0075)
24	Prior Total Effective Energy Efficiency Rate - \$/Ccf (Informational Only)		\$ 0.0213	\$ 0.0364	\$ 0.0120	\$ -
25	Prior Total Effective Energy Efficiency Rate - \$/MMBtu (Informational Only)				\$ 0.1137	\$ 0.4478
26	Energy Efficiency Rate Adjustment to Base Rates - \$/Ccf		\$ 0.0239	\$ 0.0186	\$ 0.0259	\$ -
27	Energy Efficiency Rate Adjustment to Base Rates - \$/MMBtu				\$ 0.2494	\$ (0.4553)