STATE OF FLORIDA

Commissioners: JOE GARCIA, CHAIRMAN J. TERRY DEASON SUSAN F. CLARK JULIA L. JOHNSON E. LEON JACOBS, JR.



TIMOTHY DEVLIN, DIRECTOR AUDITING & FINANCIAL ANALYSIS (850) 413-6480

Public Service Commission

July 19, 1999

Mr. Michael A. Palecki City Gas Company of Florida PMB 110-M 3111-20 Mahan Drive Tallahassee, FL 32308-5511

Re: Docket No. 990002-EG; City Gas Company of Florida Audit Report; Conservation - Historical Year Ended March 31, 1999 Audit Control No. 99-079-4-1

Mr. Palecki:

The enclosed audit report is forwarded for your review. If you desire to file a response to the audit, please file one with the division of Records and Reporting so it may be forwarded for consideration by the staff analysts in their review of the audit.

Sincerely,

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Denise N. Vandiver Bureau Chief - Auditing Services

| FA DNV: sp FP cc: Division of Records and Reporting Division of Auditing and Financial Analysis (Devlin/Causseaux/Harvey/File Fold Division of Electric and Gas (Lowery) EG Miami District Office (Welch) NAG OFFC RRR SEC Office of Public Counsel | der) DOCUMENT NUMBER-DATE | 08618 JUL 205 |
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GO-RECORDS/REPORTING



FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF AUDITING AND FINANCIAL ANALYSIS BUREAU OF AUDITING SERVICES

Miami District Office

CITY GAS COMPANY OF FLORIDA

CONSERVATION CLAUSE

HISTORICAL YEAR END MARCH 31, 1999

DOCKET NO. 990002-EG

AUDIT CONTROL NO. 99-079-4-1

Kathy L. Welch, Audit Manager

Ruth K. Young, Professional Accountant Specialist

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DIVISION OF AUDITING AND FINANCIAL ANALYSIS AUDITOR'S REPORT JULY 9, 1998

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described in this report to audit the Conservation True-Up schedules for the historical 12-month period ended March 31, 1999 for City Gas Company. These schedules were prepared by the utility as part of its petition for conservation recovery in Docket 990002-EG. There is confidential information associated with this audit that has been filed with the Division of Records and Reporting. There are no audit staff minority opinions.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this document must not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

In our opinion, the schedules referred to above present fairly, in all material respects, the utility's books and records, maintained in conformity with the accounting practices prescribed by the Florida Public Service Commission. The attached findings discuss all differences and other matters which were noted during our examination.

SUMMARY OF SIGNIFICANT FINDINGS

The company made duplicate entries for common payroll which overstated the true-up by \$47,415.

SUMMARY OF SIGNIFICANT PROCEDURES

Our audit was performed by examining, on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below. The following definitions apply when used in this report:

Scanned-The documents or accounts were read quickly looking for obvious errors.

Compiled-The exhibit amounts were reconciled with the general ledger, and accounts were scanned for errors or inconsistency.

Reviewed-The exhibit amounts were reconciled with the general ledger, The general account balances were traced to the subsidiary ledgers, and selective analytical review procedures were applied.

Examined-The exhibit amounts were reconciled with the general ledger. The general account balances were traced to the subsidiary ledgers. Selective analytical review procedures were applied, and account balances were tested to the extent further described.

Confirmed-Evidential matter supporting an account balance, transaction, or other information was obtained directly from an independent third party.

Verify-The item was tested for accuracy, and substantiating documentation was examined.

REVENUES: Examined the revenues from the general ledger and reconciled them to the Company schedules CT-3. Compiled the therms sold from the Company's revenue worksheets and applied the applicable rate factors approved in Commission orders. Reconciled the revenue calculation to the Company's CT-3 schedules. Recomputed bills for various rate classes to determine that the applicable factor was actually charged.

EXPENSES: Examined expense amounts in the general ledger and reconciled them to the Company's CT-3 schedules. Staff tested 100% of all advertising expenses by tracing to the invoices and advertisements. From the Company's prepaid printout of incentives, staff pulled a judgmental sample. The incentive expenses were traced to vouchers, invoices, and sales contracts. Recalculated the year end allocation of

transportation expenses and agreed them to the general ledger.

TRUE-UP: Recalculated the true-up and verified the beginning true-up to the orders and the interest rates to the Wall Street Journal.

III. EXCEPTIONS

Exception No. 1

Subject: Duplication of Common Payroll

Statement of fact: The company made several adjustment to its books to prepare the filing. One of these adjustments was labeled "LL" and added common payroll for two employees that had not been directly charged. The entry added \$16,424.81 of payroll to the filing (\$14,422.56 in August and \$2,002.25 in September). However, the company had made another adjusting entry to payroll that had already included this adjustment.

The company also made an adjustment labeled "S" for the benefits related to this adjustment. It increased filing expenses by \$7,046.84 (\$5,047.90 in August and \$1,998.94 in September). With the payroll adjustment this totals \$23,471.65.

When the company posted these two adjustments, it totaled the months in December's adjustment column. Therefore, it posted these two adjustments twice, totaling \$46,943.30.

Opinion: The adjustments should never have been posted and need to be removed twice because of the error in the way the company totaled the columns. Interest amounts to \$472 according to the attached true-up revision. With interest, this amounts to \$47,415.

| | 1998 | 1998 | 1998 | 1998 | 1998 | 1998 | 1998 | 1998 | 1998 | 1999 | 1999 | 1999 | |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|-------------------|
| - | APRIL | MAY | JUNE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | JANUARY | FEBRUARY | MARCH | TOTAL |
| Beginning | 5.550% | 5.530% | 5.500% | 5.600% | 5.560% | 5.520% | 5.220% | 5.100% | 5.500% | 4.900% | 4.810% | 4.850% | |
| Ending | 5.530% | 5.500% | 5.600% | 5.560% | 5.520% | 5.220% | 5.100% | 5.500% | 4.900% | 4.810% | 4.850% | 4.880% | • |
| Total | 11.080% | 11.030% | 11.100% | 11,160% | 11.080% | 10,740% | 10.320% | 10.600% | 10.400% | 9.710% | 9.660% | 9.730% | |
| Average | 5.540% | 5.515% | 5.550% | 5.580% | 5.540% | 5.370% | 5,160% | 5.300% | 5.200% | 4.855% | 4.830% | 4.865% | |
| Monthly Average | 0.462% | 0.460% | 0.463% | 0.465% | 0.462% | 0.448% | 0.430% | 0.442% | 0.433% | 0.405% | 0.403% | 0.405% | |
| | | | | | | | | | | | | | |
| CALCULATION OF TRUE-UP | | | | | | | | | | | | | |
| Total Revenues-net of tax, (Line 4) | (217,349) | (149,379) | (153,972) | (147,231) | (132,757) | (136,089) | (140,040) | (166,553) | (159,298) | (199,902) | (218,405) | (200,219) | (2,021,194) |
| Prior True-up (Line 5) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | | (19,978) | | | | (19,978) | (19,978) | (239,738) |
| Total revenue to current period | (237,327) | (169,357) | (173,950) | (167,209) | (152,735) | (156,067) | (160,018) | (186,531) | (179,276) | (219,880) | (238,383) | (220,197) | (2,260,932) |
| Conservation Expenses (Line 7) | 256,118 | 138,014 | 295,010 | 162,491 | 139,927 | 155,465 | 187,112 | 111,110 | 184,465 | 140,383 | 155,964 | 143,906 | 2,069,965 |
| True-up this period (Line 8) | 18,791 | (31,343) | 121,060 | (4,718) | (12,808) | (602) | 27,094 | (75,422) | 5,189 | (79,497) | (82,419) | (76,291) | (190,967) |
| Interest provision (Line 9) | (1,017) | (954) | (665) | (308) | (256) | (190) | (40) | (60) | (125) | (186) | (432) | (677) | (4,910) |
| True-up & interest beginning (Line 10) | (239,738) | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (41,352) | (16,310) | (76,015) | (138,888) | (239,738) |
| Prior true-up coll. refunded | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 239,738 |
| Total net true-up | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (41,352) | | (76,015) | (138,888) | (195,878) | (195,87 8) |
| True-up for the month CO. FILING | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (21,839) | 7,298 | (52,312) | (115,089) | (148,463) | (148,463) |
| | | | | | | | | | | | | | |
| Difference | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (19,513) | (23,608) | (23,703) | (23,799) | (47,415) | (47,415) |
| | | | | | | | | | | | | | |
| CALCULATION OF INTEREST | | | | | | | | | | | | | |
| Beginning true up and int. | (239,738) | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (41,352) | (16,310) | (76,015) | (138,888) | (1,132,305) |
| Ending true-up before int | (200,969) | (213,351) | (73,268) | (58,673) | (51,811) | • • • | 14,192 | (41,292) | • • • | (75,829) | (138,456) | (195,201) | (1,083,534) |
| Total | (440,707) | (415,338) | (287,573) | (132,605) | (110,792) | | (18,689) | • • • | • • • • | (92,139) | (214,471) | (334,088) | (2,215,838) |
| Iotai | (440,707) | (410,000) | (207,070) | (102,000) | (110,102) | (04,700) | (10,000) | (27,141) | (07,007) | (02,100) | (211,111) | (00 ,,000) | 0 |
| Average true up | (220,354) | (207,669) | (143,787) | (66,303) | (55,396) | (42,379) | (9,344) | (13,570) | (28,769) | (46,069) | (107,236) | (167,044) | (1,107,919) |
| ····· | () | ····· | | , | , | | | | | | | | |
| Interest rate per above | 0.46% | 0.46% | 0.46% | 0.47% | 0.46% | 0.45% | 0.43% | 0.44% | 0.43% | 0.40% | 0.40% | 0.41% | |
| Interest per staff | (1,017) | (954) | (665) | (308) | (256) | • • | (40) | | | | | (677) | (4,910) |
| True-up for the month Company's Filing | (1,017) | (954) | (665) | (308) | (256) | (190) | (40) | (17) |) (31) | (91) | (336) | (533) | (4,438) |
| | | 0 | 0 | 0 | 0 | 0 | 0 | (43) |) (94) | (95) | (96) | (144) | (472) |
| Difference | 0 | U | | U | 0 | | V | (43) | (54) | (33) | 1307 | ···· | |

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III. EXHIBITS

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() REFLECTS OVER-RECOVERY

LESS PROJECTED TRUE-UP

ADJUSTED NET TRUE-UP

| PRINCIPLE | (29,285) |
|-----------|----------|

(2,751)

(4,439)

END OF PERIOD NET TRUE-UP

INTEREST

INTEREST

ADJUSTED NET TRUE UP FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

PRINCIPLE (144,024)

CITY GAS COMPANY OF FLORIDA

(148,463)

(32,036)

(116,427)

•

ANALYSIS OF ENERGY CONSERVATION PROGRAM COSTS ACTUAL VERSUS ESTIMATED FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| | ACTUAL | PROJECTED | DIFFERENCE |
|----------------------|-----------|-----------|------------|
| CAPITAL INVESTMENT | - | | - |
| PAYROLL & BENEFITS | 643,646 | 570,206 | 73,440 |
| MATERIALS & SUPPLIES | 2,049 | 3,400 | (1,351) |
| ADVERTISING | 169,857 | 285,694 | (115,837) |
| INCENTIVES | 1,232,677 | 1,353,503 | (120,826) |
| OUTSIDE SERVICES | 10,618 | - | 10,618 |
| VEHICLES | 58,061 | 41,763 | 16,298 |

| - | 600 | (600) |
|-------------|---|---|
| 2,116,908 | 2,255,166 | (138,258) |
| | <u>-</u> | |
| 2,116,908 | 2,255,166 | (138,258) |
| | | |
| - | - | - |
| - | | |
| (2,260,932) | (2,284,451) | 23,519 |
| | | |
| (144,024) | (29,285) | (114,739) |
| (4,439) | (2,751) | (1,688) |
| (148,463) | (32,036) | (116,427) |
| | 2,116,908 - - (2,260,932) - (144,024) (4,439) | 2,116,908 2,255,166 (2,260,932) (2,284,451) (144,024) (29,285) (4,439) (2,751) |

() REFLECTS OVER-RECOVERY

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ACTUAL CONSERVATION PROGRAM COSTS PER PROGRAM FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| PROGRAM NAME | CAPITAL INVESTMENT | PAYROLL & BENEFITS | MATERIALS & SUPPLIES | ADVERTISING | INCENTIVES | OUTSIDE SERVICES | VEHICLE | OTHER | TOTAL |
|---------------------------------------|-----------------------|-----------------------|-------------------------|-------------|------------|---------------------|---------|-------|-----------|
| PROGRAM 1: SINGLE FAMILY HOME BUILDER | - | 108,022 | - | 9,586 | 863,705 | - | 12,010 | - | 993,323 |
| PROGRAM 2: MULTI FAMILY HOME BUILDER | - | 17,467 | - | - | 32,400 | - | 959 | - | 50,826 |
| PROGRAM 3: ELECTRIC REPLACEMENT | - | 183,738 | 397 | 147,499 | 285,152 | - | 19,207 | - | 635,993 |
| PROGRAM 4: DEALER PROGRAM | - | - | - | - | - | - | - | ~ | - |
| PROGRAM 5: SCHOOLS PROGRAM | - | 3,313 | 1,500 | - | - | - | 621 | - | 5,434 |
| PROGRAM 6: PROPANE CONVERSION | - | 13,836 | - | - | 75 | - | 1,126 | - | 15,037 |
| PROGRAM 7: WATER HEATER RETENTION | - | 38,639 | - | - | 9,063 | - | 3,458 | - | 51,160 |
| PROGRAM 8: RESIDENTIAL CUT AND CAP | - | 29,694 | - | 405 | 13,386 | - | 3,074 | - | 46,559 |
| PROGRAM 9: COMM/IND CONVERSION | - | 154,747 | - | 2,500 | 28,896 | - | 15,139 | - | 201,282 |
| PROGRAM 10: ALTERNATIVE TECHNOLOGY | - | 46,623 | - | 7,867 | - | - | 2,467 | - | 56,957 |
| COMMON COSTS | <u>-</u> | 47,567 | 152 | 2,000 | | 10,618 | | | 60,337 |
| TOTAL TOTAL OF ALL PROGRAMS | | 643,646 | 2,049 | 169,857 | 1,232,677 | 10,618 | 58,061 | | 2,116,908 |

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CONSERVATION COSTS PER PROGRAM - VARIANCE ACTUAL VERSUS PROJECTED FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| PROGRAM NAME | CAPITAL INVESTMENT | PAYROLL & BENEFITS | MATERIALS & SUPPLIES | ADVERTISING | INCENTIVES | OUTSIDE SERVICES | VEHICLE | OTHER | TOTAL |
|--------------------------------|-----------------------|-----------------------|-------------------------|-------------|------------|---------------------|---------|-------|-----------|
| PROGRAM 1: SINGLE FAMILY HOME | BUILDER - | (31,704) | - | (14,412) | (29,761) | - | 2,433 | - | (73,444) |
| PROGRAM 2: MULTI FAMILY HOME | BUILDER - | 4,188 | - | (5,000) | 29,400 | - | 959 | - | 29,547 |
| PROGRAM 3: ELECTRIC REPLACEME | NT - | 54,378 | 397 | (12,792) | (6,588) | - | (836) | - | 34,559 |
| PROGRAM 4: DEALER PROGRAM | 2 | - | - | - | (255) | - | - | - | (255) |
| PROGRAM 5: SCHOOLS PROGRAM | - | (10,874) | (700) | (1,300) | - | - | 402 | - | (12,472) |
| PROGRAM 6: PROPANE CONVERSIO | N - | 4,112 | - | (5,779) | (4,617) | - | 626 | - | (5,658) |
| PROGRAM 7: WATER HEATER RETER | NTION - | 1,015 | - | (12,728) | (16,964) | - | 2,585 | - | (26,092) |
| PROGRAM 8: RESIDENTIAL CUT ANI | D CAP - | 15,888 | (600) | (3,354) | (6,339) | - | 128 | - | 5,723 |
| PROGRAM 9: COMM/IND CONVERSI | ON - | (18,018) | - | (36,639) | (19,702) | - | 8,351 | - | (66,008) |
| PROGRAM 10: ALTERNATIVE TECHNO | DLOGY - | 6,888 | (600) | (13,833) | (66,000) | - | 1,650 | - | (71,895) |
| COMMON COSTS | | 47,567 | 152 | (10,000) | | 10,618 | | (600) | 47,737 |
| TOTAL TOTAL OF ALL PROGR | AMS | 73,440 | (1,351) | (115,837) | (120,826) | 10,618 | 16,298 | (600) | (138,258) |

() REFLECTS PROJECTED OVER ACTUAL EXPENSE ESTIMATES

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ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION SUMMARY OF EXPENSES BY MONTH FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| E | EXPENSES: | Actual Apr-98 | Actual May-98 | Actual Jun-98 | Actual Jul-98 | Actual Aug-98 | Actual Sep-98 | Actual Oct-98 | Actual Nov-98 | Actual Dec-98 | Actual Jan-99 | Actual Feb-99 | Actual Mar-99 | Total |
|---|----------------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|-----------|
| | | | | | | | | | | | | | | |
| | PROGRAM 1: | 117,147 | 49,966 | 164,589 | 76,722 | 62,965 | 71,394 | 68,312 | 49,913 | 104,124 | 67,738 | 94,041 | 66,412 | 993,323 |
| | PROGRAM 2: | 1,692 | 1,253 | 2,306 | 2,996 | 2,088 | 961 | 34,235 | 1,911 | 1,853 | 616 | 462 | 453 | 50,826 |
| | PROGRAM 3: | 110,726 | 54,974 | 90,163 | 51,281 | 40,870 | 48,325 | 56,042 | 27,990 | 40,271 | 44,088 | 28,400 | 42,863 | 635,993 |
| | PROGRAM 4: | - | - | - | - | - | - | - | - | - | - | - | - | - |
| | PROGRAM 5: | 728 | 705 | 1,982 | 42 | 57 | 168 | 186 | 780 | 188 | 195 | 198 | 205 | 5,434 |
| | PROGRAM 6: | - | - | 2,003 | 2,534 | 2,690 | 2,292 | 886 | 923 | 971 | 909 | 923 | 906 | 15,037 |
| | PROGRAM 7: | 2,788 | 3,309 | 5,330 | 7,001 | 8,665 | 2,473 | 6,355 | 1,927 | 2,948 | 3,127 | 3,503 | 3,734 | 51,160 |
| | PROGRAM 8: | 2,906 | 8,732 | 6,322 | 3,766 | 3,329 | 5,161 | 1,784 | 3,184 | 4,484 | 2,326 | 1,904 | 2,661 | 46,559 |
| - | PROGRAM 9: | 17,292 | 12,872 | 20,224 | 16,209 | 13,208 | 16,145 | 13,442 | 18,174 | 17,270 | 17,915 | 15,261 | 23,270 | 201,282 |
| - | PROGRAM 10: | 2,839 | 6,203 | 2,091 | 1,940 | 6,055 | 7,123 | 2,238 | 5,890 | 12,354 | 2,989 | 3,704 | 3,531 | 56,957 |
| | COMMON COSTS | - | - | - | - | - | 1,423 | 3,632 | 19,888 | 4,003 | 480 | 7,568 | 23,343 | 60,337 |
| | TOTAL | 256,118 | 138,014 | 295,010 | 162,491 | 139,927 | 155,465 | 187,112 | 130,580 | 188,466 | 140,383 | 155,964 | 167,378 | 2,116,908 |
| | LESS AMOUNT INCLUDED IN | | | | | | | | | | | | _ | |
| | RATE BASE | | | | <u> </u> | <u>-</u> | | | | | | | | |

| RECOVERABLE | | | | | | | | | | | | | |
|--------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-----------|
| CONSERVATION | | | | | | | | | | | | | |
| EXPENSES | 256,118 | 138,014 | 295,010 | 162,491 | 139,927 | 155,465 | 187,112 | 130,580 | 188,466 | 140,383 | 155,964 | 167,378 | 2,116,908 |

(52,312) (115,089) (148,463) (148,463)

7,298

(21,839)

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ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| | | Actual Apr-98 | Actual May-98 | Actual Jun-98 | Actual Jul-98 | Actual Aug-98 | Actual Sep-98 | Actual Oct-98 | Actual Nov-98 | Actual Dec-98 | Actual Jan-99 | Actual Feb-99 | Actual Mar-99 | Total |
|------|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|-------------|
| 1 R | CS AUDIT FEES | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 0 | THER PROGRAM REVS | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 C | ONSERV. ADJ REVS | (217,349) | (149,379) | (153,972) | (147,231) | (132,757) | (136,089) | (140,040) | (166,553) | (159,298) | (199,902) | (218,405) | (200,219) | (2,021,194) |
| | OTAL REVENUES RIOR PERIOD TRUE UP NOT | (217,349) | (149,379) | (153,972) | (147,231) | (132,757) | (136,089) | (140,040) | (166,553) | (159,298) | (199,902) | (218,405) | (200,219) | (2,021,194) |
| A | PPLICABLE TO THIS PERIOD | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,978) | (19,980) | (239,738) |
| | ONSERVATION REVENUES | | | | | | | | | | | | | |
| 6 | APPLICABLE TO THE PERIOD | (237,327) | (169,357) | (173,950) | (167,209) | (152,735) | (156,067) | (160,018) | (186,531) | (179,276) | (219,880) | (238,383) | (220,199) | (2,260,932) |
| | ONSERVATION EXPENSES (FROM CT-3, PAGE 1) | 256,118 | 138,014 | 295,010 | 162,491 | 139,927 | 155,465 | 187,112 | 130,580 | 188,466 | 140,383 | 155,964 | 167,378 | 2,116,908 |
| 8 T | RUE-UP THIS PERIOD | 18,791 | (31,343) | 121,060 | (4,718) | (12,808) | (602) | 27,094 | (55,951) | 9,190 | (79,497) | (82,419) | (52,821) | (144,024) |
| | NTEREST PROVISION THIS PERIOD (FROM CT-3 PAGE 3) | (1,017) | (954) | (665) | (308) | (256) | (190) | (40) | (17) | (31) | (91) | (336) | (533) | (4,439) |
| | Rue-up & Inter. Prov. Eginning of Month | (239,738) | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (21,839) | 7,298 | (52,312) | (115,089) | |
| 11 P | RIOR PERIOD TRUE UP | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | COLLECTED/(REFUNDED) | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,978 | 19,980 | |

12 TOTAL NET TRUE UP (SUM LINES 8+9+10+11) (201,986) (214,306) (73,933) (58,981)

(58,981) (52,067) (32,880) 14,151

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CALCULATION OF TRUE-UP AND INTEREST PROVISION FOR MONTHS: APRIL 1998 THROUGH MARCH 1999

| | INTEREST PROVISION | Actual Apr-98 | Actual May-98 | Actual Jun-98 | Actual Jul-98 | Actual Aug-98 | Actual Sep-98 | Actual Oct-98 | Actual Nov-98 | Actuai Dec-98 | Actual Jan-99 | Actual Feb-99 | Actual Mar-9 9 | Total |
|-----|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------------------|-------|
| 1. | BEGINNING TRUE-UP | (239,738) | (201,986) | (214,306) | (73,933) | (58,981) | (52,067) | (32,880) | 14,151 | (21,839) | 7,298 | (52,312) | (115,089) | |
| 2. | Ending true-up before Interest | (200,969) | (213,351) | (73,268) | (58,673) | (51,811) | (32,691) | 14,192 | (21,822) | 7,329 | (52,221) | (114,753) | (147,930) | |
| 3. | Total Beginning & Ending True-Up | (440,707) | (415,338) | (287,573) | (132,605) | (110,792) | (84,758) | (18,689) | (7,670) | (14,509) | (44,923) | (167,065) | (263,019) | |
| 4. | AVERAGE TRUE-UP (LINE 3 TIMES 50%) | (220,354) | (207,669) | (143,/87) | (66,303) | (55,396) | (42,379) | (9,344) | (3,835) | (7,255) | (22,461) | (83,532) | (131,510) | |
| 5. | INTER. RATE - 1ST DAY OF REPORTING MONTH | 5.550% | 5.530% | 5.500% | 5.600% | 5.560% | 5.520% | 5.220% | 5.100% | 5.500% | 4.900% | 4.810% | 4.850% | |
| 6. | INTER. RATE - 1ST DAY OF SUBSEQUENT MONTH | 5.530% | 5.500% | 5.600% | 5.560% | 5.520% | 5.220% | 5.100% | 5.500% | 4.900% | 4.810% | 4.850% | 4.880% | |
| 7. | TOTAL (SUM LINES 5 & 6) | 1 1 .080% | 11.030% | 11.100% | 11.160% | 11.080% | 10.740% | 10.320% | 10.600% | 10.400% | 9.710% | 9.660% | 9.730% | |
| 8. | AVG INTEREST RATE (LINE 7 TIMES 50%) | 5.540% | 5.515% | 5.550% | 5.580% | 5.540% | 5.370% | 5.160% | 5.300% | 5.200% | 4.855% | 4.830% | 4.865% | |
| 9. | MONTHLY AVG INTEREST RATE | 0.462% | 0.460% | 0.463% | 0.465% | 0.462% | 0.448% | 0.430% | 0.442% | 0.433% | 0.405% | 0.403% | 0.405% | |
| 10. | INTEREST PROVISION (LINE 4 TIMES LINE 9) | (1,017) | (954) | (665) | (308) | (256) | (190) | (40) | (17) | (31) | (91) | (336) | (533) | (4,43 |

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