

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition for approval of GRIP cost recovery factors, by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.

DOCKET NO. 20190173-GU
ORDER NO. PSC-2019-0502-TRF-GU
ISSUED: November 25, 2019

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
JULIE I. BROWN
DONALD J. POLMANN
GARY F. CLARK
ANDREW GILES FAY

TARIFF ORDER APPROVING GAS RELIABILITY INFRASTRUCTURE
PROGRAMS COST RECOVERY FACTORS

BY THE COMMISSION:

Background

On September 3, 2019, Florida Public Utilities Company (FPUC), Florida Public Utilities Company-Fort Meade (Fort Meade), and Florida Division of Chesapeake Utilities Corporation (Chesapeake), collectively the companies, filed a joint petition for approval of their gas reliability infrastructure program (GRIP or program) cost recovery factors for the period January through December 2020. The GRIP for FPUC and Chesapeake was first approved in Order No. PSC-12-0490-TRF-GU (2012 order) to recover the cost of accelerating the replacement of cast iron and bare steel distribution mains and services, including a return on investment, through a surcharge on customers' bills.¹ Fort Meade's GRIP was originally approved in Order No. PSC-15-0578-TRF-GU, and allowed Fort Meade to file its annual petition for GRIP factors concurrently with FPUC and Chesapeake.² The current GRIP charges for January through December 2019 were approved in Order No. PSC-2018-0547-TRF-GU.³

¹ Order No. PSC-12-0490-TRF-GU, issued September 24, 2012, in Docket No. 120036-GU, *In re: Joint petition for approval of Gas Reliability Infrastructure Program (GRIP) by Florida Public Utilities Company and the Florida Division of Chesapeake Utilities Corporation.*

² Order No. PSC-15-0578-TRF-GU, issued December 21, 2015, in Docket No. 150191-GU, *In re: Joint petition for approval to implement gas reliability infrastructure program (GRIP) for Florida Public Utilities Company-Fort Meade and for approval of GRIP cost recovery factors by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and the Florida Division of Chesapeake Utilities Corporation.*

³ Order No. PSC-2018-0547-TRF-GU, issued November 19, 2018, in Docket No. 20180163-GU, *In re: Joint petition for approval of gas reliability infrastructure program (GRIP) cost recovery factors by Florida Public*

On October 8, 2019, the companies filed responses to Commission staff's first data request. On October 11, 2019, the companies filed responses to Commission staff's second data request. In an email dated October 21, 2019, the companies waived the 60-day file and suspend provision of Section 366.06(3), Florida Statutes (F.S.), until the November 5, 2019 Agenda Conference. The tariff sheets approved herein are contained in Attachment B (FPUC), Attachment C (Chesapeake), and Attachment D (Fort Meade) to this Order. We have jurisdiction over this matter pursuant to Sections 366.03, 366.04, 366.05, and 366.06, F.S.

Decision

The GRIP surcharges have been in place since January 2013 for FPUC and Chesapeake, while Fort Meade's surcharges were first implemented in January 2017. In response to Commission staff's data requests, the companies stated that replacement projects in Winter Haven, Lake Worth, New Smyrna Beach, West Palm Beach, Palm Beach, Fort Meade, Bartow, and Lake Wales were completed in 2019. Additional replacement projects in Lake Worth, Winter Haven, New Smyrna Beach, West Palm Beach, Palm Beach, Boynton Beach, Haines City, Lake Wales, and Lake Alfred were projected to continue into 2020. Attachment A to this Order provides an update of mains and services replaced and replacement forecasts. The companies stated that they prioritize the potential replacement projects focusing on areas of high consequence and areas more susceptible to corrosion.

FPUC's True-ups by Year

FPUC's calculation for the 2020 GRIP revenue requirement and surcharges include a final true-up for 2018, an actual/estimated true-up for 2019, and projected costs for 2020. FPUC was authorized to recover \$747,727 of annual GRIP expenses in base rates; therefore, the \$747,727 is excluded from the GRIP surcharge calculation.

Final True-up for 2018

FPUC stated that the revenues collected through the GRIP surcharges for 2018 were \$10,326,269, compared to a revenue requirement of \$9,994,382, resulting in an over-recovery of \$331,887. The 2017 over-recovery of \$2,231,264, the 2018 over-recovery of \$331,887, and interest of \$53,720 associated with any over- and under-recoveries results in a final 2018 true-up of \$2,616,870 (over-recovery).

Actual/Estimated 2019 True-ups

FPUC provided actual revenues for January through July 2019 and estimated revenues for August through December 2019, totaling \$9,166,112, compared to an actual/estimated revenue requirement for 2019 of \$10,326,381, resulting in an under-recovery of \$1,160,269. The 2018 over-recovery of \$2,616,870, the 2019 under-recovery of \$1,160,270, and interest of \$56,582 results in a total 2019 over-recovery of \$1,513,182.

Projected 2020 Costs

FPUC expects capital expenditures of \$12,220,000 for the replacement of cast iron/bare steel infrastructure in 2020. The return on investment (which includes federal income taxes, regulatory assessment fees, and bad debt), depreciation expense, and property tax and customer notification expense associated with that investment are \$12,112,394. Subtracting the revenue requirement for bare steel replacement included in base rates results in a 2020 revenue requirement of \$11,364,667. After subtracting the total 2019 over-recovery of \$1,513,182, the 2020 revenue requirement is \$9,851,484. Table 1 shows FPUC's 2020 revenue requirement calculation.

Table 1
FPUC 2020 Revenue Requirement Calculation

2020 Projected Expenditures	\$10,000,000
Return on Investment	\$7,355,418
Depreciation Expense	2,815,901
Property Tax and Customer Notice Expense	<u>1,941,074</u>
2020 Revenue Requirement	\$12,112,394
Less Revenue Requirement in Base Rates	<u>747,727</u>
2020 GRIP Revenue Requirement	\$11,364,667
Less 2019 Over-recovery	<u>1,513,182</u>
2020 Total Revenue Requirement	\$9,851,484

Source: FPUC Responses to Staff's First Data Request, Attachment 2 Schedule C-2 page 4 of 15

Chesapeake's True-ups by Year

Chesapeake's calculation for the 2020 GRIP revenue requirement and surcharges include a final true-up for 2018, an actual/estimated true-up for 2019, and projected costs for 2020. Chesapeake does not have a replacement recovery amount embedded in base rates.

Final True-up for 2018

Chesapeake stated that the revenues collected for 2018 were \$3,602,006, compared to a revenue requirement of \$3,246,851, resulting in over-recovery of \$355,155. The 2017 under-recovery of \$164,174, 2018 over-recovery of \$355,155, and interest of \$1,164 associated with any over- and under-recoveries results in a final 2018 over-recovery of \$192,146.

Actual/Estimated 2019 True-up

Chesapeake provided actual GRIP revenues for January through July 2019 and estimated revenues for August through December 2019, totaling \$4,381,645, compared to an actual/estimated revenue requirement of \$3,883,318, resulting in an over-recovery of \$498,327.

The 2018 over-recovery of \$192,146, 2019 over-recovery of \$498,327, and interest of \$11,425 associated with any over- and under-recoveries results in a total 2019 over-recovery of \$701,897.

Projected 2020 Costs

Chesapeake projects capital expenditures of \$2,000,000 for the replacement of cast iron/bare steel infrastructure in 2020. The return on investment, depreciation expense, and property tax and customer notification expense to be recovered in 2020 totals \$4,181,223. After subtracting the total 2019 over-recovery of \$701,897, the total 2020 revenue requirement is \$3,479,326. Table 2 shows Chesapeake’s 2020 revenue requirement calculation.

Table 2
 Chesapeake 2020 Revenue Requirement Calculation

2020 Projected Expenditures	\$2,000,000
Return on Investment	\$2,511,628
Depreciation Expense	986,653
Property Tax and Customer Notice Expense	<u>682,942</u>
2020 Revenue Requirement	\$4,181,223
Less 2019 Over-recovery	<u>701,897</u>
2020 Total Revenue Requirement	\$3,479,326

Source: FPUC Responses to Staff’s First Data Request, Attachment 2 Schedule C-2 page 9 of 15

Fort Meade’s True-ups by Year

Fort Meade started its replacement program in 2016 and first implemented GRIP surcharges in January 2017. Unlike FPUC and Chesapeake, only bare steel services (and no mains) require replacement in Fort Meade. Fort Meade’s replacement program was originally scheduled to be completed in 2018. However, the companies explained that as a result of delays in contractor availability and permitting, the replacement program is expected to conclude in 2019.

Final True-up for 2018

Fort Meade stated that the revenues collected for 2018 were \$7,394, compared to a revenue requirement of \$24,720, resulting in an under-recovery of \$17,326. Adding the 2017 over-recovery of \$13,528, the 2018 under-recovery of \$17,326, and \$104 for interest associated with any over- and under-recoveries, the final 2018 under-recovery is \$3,693.

Actual/Estimated 2019 True-up

Fort Meade provided actual GRIP revenues for January through July 2019 and estimated revenues for August through December 2019 totaling \$25,087, compared to an actual/estimated revenue requirement of \$25,518, resulting in an under-recovery of \$431. Adding the 2018 under-

recovery of \$3,693, the 2019 under-recovery of \$431, and interest of \$64 associated with any over- and under-recoveries, the resulting total 2019 true-up is an under-recovery of \$4,188.

Projected 2020 Costs

Fort Meade projects capital expenditures of \$0 for the replacement of cast iron/bare steel infrastructure in 2020, as the replacement program is scheduled to be completed in 2019. Therefore, the 2020 GRIP factors are designed to only recover the remaining 2019 under-recovery of \$4,188 and the revenue requirement of \$25,526 associated with the 2019 year-end total investment ($\$4,188 + \$25,526 = \$29,714$).

Proposed Surcharges for FPUC, Chesapeake, and Fort Meade

As established in the 2012 order approving the GRIP program, the total 2020 revenue requirement is allocated to the rate classes using the same methodology used for the allocation of mains and services in the cost of service study used in the utilities' most recent rate case. The respective percentages were multiplied by the 2020 revenue requirements and divided by each rate class' projected therm sales to provide the GRIP surcharge for each rate class.

The proposed 2020 GRIP surcharge for FPUC's residential customers on the Residential Service (RS) schedule is \$0.22312 per therm (compared to the current surcharge of \$0.21356 per therm). The monthly bill impact is \$4.46 for a residential customer using 20 therms per month. The proposed FPUC tariff page is shown in Attachment B.

The proposed 2020 GRIP surcharge for Chesapeake's residential customers on the FTS-1 schedule is \$0.10585 per therm (compared to the current surcharge of \$0.13593). The monthly bill impact is \$2.12 for a residential customer using 20 therms per month. The proposed Chesapeake tariff pages are contained in Attachment C.

The proposed 2020 GRIP surcharge for Fort Meade's residential customers on the RS schedule is \$0.24865 per therm (compared to the current surcharge of \$0.29382). The monthly bill impact is \$4.97 for a residential customer using 20 therms per month. The proposed Fort Meade tariff page is shown in Attachment D.

Accounting and Tax Considerations

The state corporate income tax rate changed from 5.5 percent to 4.458 percent beginning on January 1, 2019 through January 1, 2022. The change in tax rate was announced by the Department of Revenue's Tax Information Publication on September 12, 2019. Therefore, the proposed 2020 factors that are addressed in this recommendation do not reflect the lower tax rate. In a noticed informal meeting on October 15, 2019, Commission staff, utility representatives, and interested persons discussed the change in the tax rate. Based on the discussions and comments made by the utilities, the companies shall address the impact of the lower tax rate in the 2019 true-up calculations provided in the surcharge petition that will be filed in September 2020 for 2021 factors.

We reviewed the companies' weighted average cost of capital (WACC), as filed in its petition. In their response to Commission staff's second data request, the companies indicated the calculation of the WACC complies with Order No. PSC-2012-0425-PAA-EU regarding IOU cost recovery clauses. However, the companies did not determine whether a proration adjustment is required. Consequently, it is unknown if the companies are in compliance with Internal Revenue Service (IRS) normalization rules, per Internal Revenue Code (IRC) §1.167(l)-1. We direct the companies to determine if the WACC complies with the normalization rules to avoid a normalization violation. Further, if an adjustment to the WACC is necessary, we find that any adjustment be made in a subsequent true-up filing.

Conclusion

We find that the calculation of the 2020 GRIP surcharge revenue requirement and the proposed GRIP surcharges for FPUC, Chesapeake, and Fort Meade are reasonable and accurate. We therefore approve FPUC's, Chesapeake's, and Fort Meade's proposed GRIP surcharges for the period January through December 2020. Furthermore, we direct the Companies to determine if the WACC complies with the normalization rules to avoid a normalization violation. Additionally, if an adjustment to the WACC is necessary, we find that any adjustment be made in a subsequent true-up filing.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that the Joint Petition for Approval of Gas Reliability Infrastructure Programs Cost Recovery Factors, by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation is hereby granted. It is further

ORDERED that Florida Public Utilities Company's, Florida Public Utilities Company-Fort Meade's, and Florida Division of Chesapeake Utilities Corporation's proposed gas reliability infrastructure program surcharges for the period January through December 2020 incorporated herein by reference are hereby approved. It is further

ORDERED that Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation shall determine if the weighted average cost of capital complies with normalization rules to avoid a normalization violation. If an adjustment to the weighted average cost of capital is necessary, then any adjustment shall be made in a subsequent true-up filing. It is further

ORDERED that if a protest is filed within 21 days of issuance of the Order, the tariffs shall remain in effect with any charges held subject to refund pending resolution of the protest. It is further

ORDERED that if no timely protest is filed, this docket shall be closed upon the issuance of a Consummating Order.

By ORDER of the Florida Public Service Commission this 25th day of November, 2019.



ADAM J. TEITZMAN
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
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Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

BYL

NOTICE OF FURTHER PROCEEDINGS

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The Commission's decision on this tariff is interim in nature and will become final, unless a person whose substantial interests are affected by the proposed action files a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on December 16, 2019.

In the absence of such a petition, this Order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

FPUC, Chesapeake, and Fort Meade Pipe Replacement Program Progress

Table 1											
FPUC Pipe Replacement Program Progress											
Mains (Miles)						Number of Services					
Year	Replaced		Remaining	Remaining	Total	Replaced		Remaining	Remaining	Total	
	Cast Iron	Bare Steel	Cast Iron at Year-End	Bare Steel at Year-End		Cast Iron	Bare Steel	Cast Iron at Year-End	Bare Steel at Year-End		
Jul-12			0.9	197.10	198.00			0	7980	7980	
2012		6.00	0.9	191.10	192.00		91	0	7889	7889	
2013	0.6	26.40	0.3	164.70	165.00		2071	0	5818	5818	
2014		38.00	0.3	126.70	127.00		1275	0	4543	4543	
2015		30.00	0.3	96.70	97.00		605	0	3938	3938	
2016		22.50	0.3	74.20	74.50		555	0	3383	3383	
2017		10.30	0.3	63.90	64.20		335	0	3048	3048	
2018		6.80	0.3	57.10	57.40		98	0	2950	2950	
2019	0.3	11.00	0	46.10	46.10		475	0	2475	2475	
2020		18.00	0	28.10	28.10		900	0	1575	1575	
2021		18.00	0	10.10	10.10		900	0	675	675	
2022		10.10	0	0.00	0.00		675	0	0	0	

Table 2											
Chesapeake Pipe Replacement Program Progress											
Mains (Miles)						Number of Services					
Year	Replaced		Remaining	Remaining	Total	Replaced		Remaining	Remaining	Total	
	Cast Iron	Bare Steel	Cast Iron at Year-End	Bare Steel at Year-End		Cast Iron	Bare Steel	Cast Iron at Year-End	Bare Steel at Year-End		
Jul-12			0	152.00	152.00			0	762	762	
2012		5.00	0	147.00	147.00		34	0	728	728	
2013		3.00	0	144.00	144.00		139	0	589	589	
2014		19.00	0	125.00	125.00		47	0	542	542	
2015		34.00	0	91.00	91.00		284	0	258	258	
2016		25.10	0	65.90	65.90		-81	0	339	339**	
2017		22.80	0	43.10	43.10		18	0	321	321	
2018		19.80	0	23.30	23.30		91	0	230	230	
2019		12.30	0	11.00	11.00		137	0	93	93	
2020		11.00	0	0.00	0.00		93	0	0	0	
2021		0.00	0	0.00	0.00		0	0	0	0	
2022		0.00	0	0.00	0.00		0	0	0	0	

** A total of 111 YTD bare steel services were replaced in 2016. Plus a correction to increase total services remaining by 132 (4th Qtr of 2016). The net equals -81.

Table 3											
Fort Meade Pipe Replacement Program Progress											
Mains (Miles)						Number of Services					
Year	Replaced		Remaining	Remaining	Total	Replaced		Remaining	Remaining	Total	
	Cast Iron	Steel	Cast Iron at Year-End	Steel at Year-End		Cast Iron	Steel	Cast Iron at Year-End	Steel at Year-End		
Jan-16			0	0	0			0	250	250	
2016		0	0	0	0		29	0	221	221	
2017		0	0	0	0		111	0	110	110	
2018		0	0	0	0		20	0	90	90	
2019		0	0	0	0		90	0	0	0	

Florida Public Utilities Company
 F.P.S.C. Gas Tariff
 35.4
 Third Revised Volume No. 1

~~Thirteenth-Fourteenth~~ Revised Sheet No.
 Cancels ~~Twelfth-Thirteenth~~ Revised Sheet No. 35.4

BILLING ADJUSTMENTS

(Continued from Sheet No. 35.3)

Gas Reliability Infrastructure Program (GRIP)

Applicability

The bill for gas or transportation service supplied to a Customer in any Billing Period shall be adjusted as follows:

The GRIP factors for the period from the first billing cycle for January ~~2019~~-2020 through the last billing cycle for December ~~2019~~-2020 are as follows:

<u>Rate Class</u>	<u>Rates Per Therm</u>
Rate Schedule RS	\$0.2135622312
Schedule GS-1	\$0.1367214188
Rate Schedule GS-2	\$0.1367214188
Rate Schedule GSTS-1	\$0.1367214188
Rate Schedule GSTS-2	\$0.1367214188
Rate Schedule LVS	\$0.0860609269
Schedule LVTS	\$0.0860609269
Schedule IS	\$0.0583005864
Schedule ITS	\$0.0583005864
Schedule GLS	\$0.3746949288
Rate Schedule GLSTS	\$0.3746949288
Rate Schedule NGV	\$0.1367214188
Rate Schedule NGVTS	\$0.1367214188

Issued by: ~~Jeffrey Householder~~ Kevin Webber, President
 JAN 01 2019

Effective:

Florida Division of Chesapeake Utilities Corporation
 No. 105.1
 Original Volume No. 4
 105.1

~~Seventh~~ Eighth Revised Sheet
 Cancels ~~Sixth~~ Seventh Sheet No.
 105.1

RATE SCHEDULES
MONTHLY RATE ADJUSTMENTS

Rate Schedule MRA

7. GAS REPLACEMENT INFRASTRUCTURE PROGRAM (GRIP):

Applicability:

All Customers receiving Transportation Service from the Company and are assigned to or have selected rate schedules FTS-A, FTS-B, FTS-1, FTS-2, FTS-2.1, FTS-3, FTS-3.1, FTS-4, FTS-5, FTS-6, FTS-7, FTS-8, FTS-9, FTS-10, FTS-11, FTS-12, and FTS-13.

The Usage Rate for Transportation Service to each applicable rate classification shall be adjusted by the following recovery factors. The recovery factors for all meters read for the period January 1, 2019 through December 31, 2020 for each rate classification are as follows:

<u>Rate Schedule</u>	<u>Classification of Service</u>	<u>Rate per therm</u>
FTS A	< 130 therms	\$0.7042358634
FTS-B	> 130 therms up to 250 therms	\$0.2188617923
FTS-1	> 0 up to 500 therms	\$0.4359310585
FTS-2	> 500 therms up to 1,000 therms	\$0.4460711969
FTS-2.1	> 1,000 therms up to 2,500 therms	\$0.4388811818
FTS-3	> 2,500 therms up to 5,000 therms	\$0.0658004936
FTS-3.1	> 5,000 therms up to 10,000 therms	\$0.0733705900
FTS-4	> 10,000 therms up to 25,000 therms	\$0.0838206632
FTS-5	> 25,000 therms up to 50,000 therms	\$0.0883707411
FTS-6	> 50,000 therms up to 100,000 therms	\$0.0666605246
FTS-7	> 100,000 therms up to 200,000 therms	\$0.0905607043
FTS-8	> 200,000 therms up to 400,000 therms	\$0.0826906898
FTS-9	> 400,000 therms up to 700,000 therms	\$0.4589714575
FTS-10	> 700,000 therms up to 1,000,000 therms	\$0.1127608765
FTS-11	> 1,000,000 therms up to 2,500,000 therms	\$0.1504409581
FTS-12	> 2,500,000 therms up to 12,500,000	\$0.0375302970
FTS-13	> 12,500,000 therms	N/A

(Continued to Sheet No. 105.2)

Issued by: Michael P. McMasters, President
 Chesapeake Utilities Corporation

Effective:

Florida Division of Chesapeake Utilities Corporation ~~Seventh~~Eighth Revised Sheet No.
105.2
Original Volume No. 4 Cancels ~~Sixth~~Seventh Revised Sheet No.
105.2

RATE SCHEDULES
MONTHLY RATE ADJUSTMENTS

Rate Schedule MRA
(Continued from Sheet No. 105.1)

7. GAS INFRASTRUCTURE REPLACEMENT PROGRAM (GRIP) (Experimental):

Applicability:

All Customers, assigned to a TTS Shipper, receiving Transportation Service from the Company and are assigned to or have selected rate schedules FTS-A (Exp), FTS-B (Exp), FTS-1 (Exp), FTS-2 (Exp), FTS-2.1 (Exp), FTS-3 (Exp), and FTS-3.1 (Exp).

The Firm Transportation Charge for Transportation Service to each applicable rate classification shall be adjusted by the following recovery factors. The recovery factors for all meters read for the period January 1, 2019 through December 31, 2019 for each rate classification are as follows:

Consumer Rate Schedule	Rate per bill
FTS-A (Exp)	\$ 4,193.62
FTS-B (Exp)	\$ 2,221.85
FTS-1 (Exp)	\$ 2,041.56
FTS-2 (Exp)	\$ 8,556.93
FTS-2.1 (Exp)	\$ 15,9013.59
FTS-3 (Exp)	\$ 19,9615.58
FTS-3.1 (Exp)	\$ 43,3735.77

(Continued to Sheet No. 105.3)

Issued by: Michael P. McMasters, President
Chesapeake Utilities Corporation

Effective:

Florida Public Utilities Company-Fort Meade
F.P.S.C. Gas Tariff
Original Volume No. 1
Sheet No. 64

~~Second-Third Revised~~ Sheet No. 64
Cancels ~~First-Second Revised~~

BILLING ADJUSTMENTS

Gas Reliability Infrastructure Program (GRIP)

Applicability

The bill for gas or transportation service supplied to a Customer in any Billing Period shall be adjusted as follows:

The GRIP factors for the period from the first billing cycle for January 2020~~19~~ through the last billing cycle for December 2020~~19~~ are as follows:

<u>Rate Class</u>	<u>Rates Per Therm</u>
Rate Schedule RS	\$0.29382 24865
Rate Schedule GS-1	\$0.08883 7705
Rate Schedule GS-2	\$0.08883 07705
Rate Schedule GSTS-1	\$0.08883 07705
Rate Schedule GSTS-2	\$0.08883 07705
Rate Schedule LVS	\$0.00000
Rate Schedule LVTS	\$0.00000
Rate Schedule IS	\$0.00000
Rate Schedule ITS	\$0.00000
Rate Schedule GLS	\$0.00000
Rate Schedule GLSTS	\$0.00000
Rate Schedule NGV	\$0.00000
Rate Schedule NGVTS	\$0.00000