

Serving Florida's Panhandle Since 1963

P. O. Box 549 / 301 Long Ave, Port St. Joe, FL 32457 **Tel: 850.229.8216** / **fax: 850.229.8392**

www.stjoegas.com

August 9, 2021

E-Portal Adam J. Teitzman, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 20210004-GU

Dear Mr. Teitzman:

Attached for electronic filing, please find St Joe Natural Gas Company's Petition for approval of its Conservation Cost Recovery Factor to be applied to customer bills during the twelve-month period ending December 31, 2022.

- 1. Schedules C-1 through C-4
- 2. Direct Testimony of Debbie Stitt

Thank you for your assistance.

Respectfully submitted,

Debbie Stitt Energy Conservation Analyst

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:	Conservation Cost)	Docket No. 20210004-GU
	Recovery Clause)	Submitted for filing
)	August 9, 2021

PETITION OF ST JOE NATURAL GAS COMPANY, INC. FOR APPROVAL OF PROPOSED CONSERVATION COST RECOVERY CHARGES

- St. Joe Natural Gas Company, Inc. ("SJNG") by and through its undersigned officer, hereby petitions the Commission for approval of its proposed conservation cost recovery factors and amounts as further identified below. In support, hereof the company states:
- 1. The Name of the petitioner and the mailing address of its principal office is:

St. Joe Natural Gas Company, Inc. P.O. Box 549
Port St. Joe, Florida 32457-0549

2. The name and mailing address of the person authorized to receive notices and communications to this petition is:

Debbie Stitt, Energy Conservation Analyst St. Joe Natural Gas Company, Inc. P.O. Box 549 Port St. Joe, Florida 32457-0549

3. Pursuant to the requirements of this docket, SJNG has prepared testimony and the conservation true-up forms supplied by the Commission Staff in a manner consistent with the Staff's instructions.

St. Joe Natural Gas Company, Inc. Docket No. 20210004-GU
August 9, 2021
Page 2

- 4. The Conservation Cost Recovery Factor was calculated in accordance with the methodology which has been previously approved by the Commission in this docket. The factor is designed to recover the projected conservation program expenses of SJNG for the twelve-month period ending December 31, 2022 adjusted for the net true-up (which includes the estimated conservation true-up for the Twelve-month period ending December 31, 2021), as well as interest calculated in accordance with the methodology established by the Commission.
- 5. SJNG projects total conservation program expenses, net of all program revenue of \$203,475 for the twelve-month period ending December 31, 2022. The estimated net true-up for the twelve months ending December 31, 2021 is an over-recovery of \$81,077. After decreasing the projected conservation expenses by the amount of this over-recovery, a total of \$122,398 remains to be collected during the twelve months ending December 31, 2022. Dividing this total by the projected sales for the period by 799,085 therms, and expanding for taxes, results in the conservation adjustment factor of \$0.34498 per therm for RS-1, \$0.23544 per therm for RS-2, \$0.18631 per therm for RS-3, \$0.13503 per therm for GS-1, \$0.06541 per therm for GS-2, and \$0.04748 per therm for GS-4/FTS-4 respectively which SJNG seeks approval in this petition.

St. Joe Natural Gas Company, Inc. Docket No. 20210004-GU August 9, 2021 Page 3

The calculation of these factors per therm is contained in the Commission prescribed worksheets filed with this petition.

WHEREFORE, St. Joe Natural Gas Company, Inc. requests that this Commission enter its order approving the above conservation cost recovery factors to be applied to the appropriate customer bills during the twelve-month period ending December 31, 2022 and to customer bills thereafter until other conservation cost recovery factors are approved by the Commission.

Dated this 9th day of August 2021.

Debbie Stitt, Regulatory Analyst St. Joe Natural Gas Company, Inc. P.O. Box 549 Port St. Joe, Florida 32457-0549 (850) 229-8216 x205

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2	In 1	Re: Conservation Cost) Docket No.20210004-GU Recovery Clause) Submitted for Filing) August 9, 2021
4	3	
5		DIRECT TESTIMONY OF DEBBIE STITT ON BEHALF OF ST. JOE NATURAL GAS COMPANY, INC.
7	Q.	Please state your name, business address, by whom you
8		are employed and in what capacity.
9	Α.	Debbie Stitt, 301 Long Avenue, Port St. Joe, Florida
10		32456, St Joe Natural Gas Company in the capacity of
11		Energy Conservation Analyst.
12	Q.	What is the purpose of your testimony?
13	Α.	My purpose is to submit the known and projected expenses and
14		revenues associated with SJNG's conservation programs incurred
15		in January thru June 2021 and projection costs to be incurred
16		from July 2021 through December 2021. It will also include
17		projected conservation costs for the period January 1, 2022
18		through December 31, 2022 with a calculation of the conservation
19		adjustment factors to be applied to the customers' bills during
20		the January 1, 2022 through December 31, 2022 period.
21	Q.	Have you prepared any exhibits in conjunction with your testimony?
22	Α.	Yes, I have prepared and filed to the Commission the 9th day of
23		August 2021 Schedule C-1 prescribed by the Commission Staff
24		which has collectively been titled Energy Conservation Adjustment
25		Summary of Cost Recovery Clause Calculation for months January

```
2
     Q. What Conservation Adjustment Factor does St. Joe Natural Gas
3
         seek approval through its petition for the twelve-month period
4
         ending December 31, 2022?
5
     A. $.34498 per therm for RS-1, $.23544 per therm for RS-2, and
6
        $.18631 per therm for RS-3, $0.13503 per therm for GS-1, $0.06541
7
         per therm for GS-2, and \$0.04748 per therm for GS-4/FTS-4
8
     Q. Does this conclude your testimony?
9
     A. Yes.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

1, 2022 through December 31, 2022 for identification.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost)	Docket No. 20210004-GU
Recovery)	Submitted for Filing
)	August 9, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing testimony have been furnished by electronic mail to the following parties of record this 9th day of August 2021.

Sebring Gas System, Inc.

Jerry H. Melendy, Jr.

3515 U.S. Hwy 27 South
Sebring, Fl 33870
Juno Beach, Fl 33408
jmelendy@floridasbestgas.com

Fl Power & Light Co
Christopher T. Wright
Juno Beach, Fl 33408
Christopher.Wright@fpl.com

Andrew M. Brown/Thomas Farrior Gunster Law Firm MacFarlane Law Firm PO Box 1531 Tampa, Fl. 33601-1531 ab@macfar.com

Florida City Gas Kurt Howard 700 Universe Boulevard Juno Beach, Fl 33408 Kurt.howard@nexteraenergy.com

Fl Public Utilities Co Mr. Mike Cassel 208 Wildlight Ave. Yulee, Fl 32097 mcassel@fpuc.com

Charles Murphy Fl. Public Service Commission 2540 Shumard Oak Blvd Tallahassee, Fl. 32399-0850 cmurphy@psc.state.fl.us

Beth Keating 215 S Monroe St., Ste. 601 Tallahassee, Fl 32301-1839 bkeating@gunster.com

Office of Public Counsel J.R. Kelly/C. Rehwinkel 111 W. Madison St, Rm. 812 Tallahassee, Fl. 32399-1400 kelly.jr@leg.state.fl.us

Peoples Gas System Paula Brown/Karen Bramley PO Box 111 Tampa, Fl 33601-0111 regdept@tecoenergy.com

SCHEDULE C-1 PAGE 1 OF 1

COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#20210004-GU

ENERGY CONSERVATION ADJUSTMENT SUMMARY OF COST RECOVERY CLAUSE CALCULATION MONTHS: JANUARY 2022 THROUGH DECEMBER 2022

1. TOTAL INCREMENTAL COSTS (SCHEDULE C-2, PAGE 1)

203,475

2. TRUE-UP (SCHEDULE C-3, PAGE 4, LINE 11)

-81,077

3. TOTAL (LINE 1 AND LINE 2)

122,398

RATE SCHEDULE	BILLS	THERM SALES	CUSTOMER CHARGE REVENUES	DELIVERY CHARGE	TOTAL CUST. & DELIVERY CHG REVENUE	ECCR REVENUES	ECCR AS % OF TOTAL REVENUES	DOLLARS THERM	TAX FACTOR	CONSERV FACTOR
RS-1	12,383	93,043	160,979	120,597	281,576	31,937	11.34225%	0.34325	1.00503	0.34498
RS-2	10,893	145,869	174,288	126,991	301,279	34,172	11.34225%	0.23426	1.00503	0.23544
RS-3	6,879	151,888	137,580	110,664	248,244	28,156	11.34225%	0.18538	1.00503	0.18631
GS-1	1,825	70,396	36,500	46,887	83,387	9,458	11.34225%	0.13435	1.00503	0.13503
GS-2	327	151,944	22,890	64,301	87,191	9,889	11.34225%	0.06509	1.00503	0.06541
FTS4/GS-4	24	185,945	48,000	29,454	77,454	8,785	11.34225%	0.04725	1.00503	0.04748
TOTAL	32,331	799,085	580,237	498,894	1,079,131	122,398				

SCHEDULE C-2 PAGE 1 OF 2

COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#20210004-GU

ESTIMATED CONSERVATION PROGRAM COSTS BY PROGRAM BY MONTH JANUARY 2022 THROUGH DECEMBER 2022

	PROGRAM	JAN 2022	FEB 2022	MAR 2022	APR 2022	MAY 2022	JUN 2022	JUL 2022	AUG 2022	SEP 2022	OCT 2022	NOV 2022	DEC 2022	TOTAL
2 3 4 5 6 7 8	RESIDENTAL NEW CONSTRUCTION RESIDENTIAL APPL. REPLACEMENT RESIDENTAL APPL. RETENTION LARGE FOOD SERVICE COMMERCIAL COMMERCIAL HOSPITALITY AND LODGING (INSERT NAME) (INSERT NAME) (INSERT NAME) (INSERT NAME) (INSERT NAME) (INSERT NAME)	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	7,533 2,619 6,804 0 0 0 0 0 0	90,400 31,425 81,650 0 0 0 0 0
	TOTAL ALL PROGRAMS	16,956	16,956	16,956	16,956	16,956	16,956	16,956	16,956	16,956	16,956	16,956	16,956	203,475

SCHEDULE C - 2 PAGE 2 OF 2

COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#20210004-GU

ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM JANUARY 2022 THROUGH DECEMBER 2022

PROGRAM	CAPITAL INVEST	PYROLL & BENEFITS	MATERLS. & SUPPLIES	ADVERT	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1 RESIDENTAL NEW CONSTRUCTION 2 RESIDENTIAL APPL. REPLACEMENT 3 RESIDENTAL APPL. RETENTION 4 LARGE FOOD SERVICE COMMERCIAL 5 COMMERCIAL HOSPITALITY AND LODGING 6 (INSERT NAME) 7 (INSERT NAME) 8 (INSERT NAME) 9 (INSERT NAME) 10 (INSERT NAME) 11 (INSERT NAME)	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	90,400 31,425 81,650 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	90,400 31,425 81,650 0 0 0 0 0
PROGRAM COSTS	0	0	0	0	203,475	0	0	0	203,475

SCHEDULE C-3 PAGE 3 OF 5

COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#20210004-GU

CONSERVATION PROGRAM COSTS BY PROGRAM ACTUAL/ESTIMATED JANUARY 2021 THROUGH DECEMBER 2021

PROGRAM NAME	JAN 2021	FEB 2021	MAR 2021	APR 2021	MAY 2021	JUN 2021	JUL 2021	AUG 2021	SEP 2021	OCT 2021	NOV 2021	DEC 2021	TOTAL
RESIDENTAL NEW CONSTRUCTION RESIDENTIAL APPL. REPLACEMENT RESIDENTAL APPL. RETENTION LARGE FOOD SERVICE COMMERCIAL COMMERCIAL HOSPITALITY AND LODGIN (INSERT NAME)	7,450 2,825 7,850 0 0 0 0 0 0	7,950 1,550 6,550 0 0 0 0 0	5,300 3,775 2,850 0 0 0 0 0	9,800 1,900 7,700 0 0 0 0 0	2,750 675 6,700 0 0 0 0 0 0	11,850 3,300 7,850 0 0 0 0 0 0	7,800 4,400 3,550 0 0 0 0 0	7,500 2,600 6,150 0 0 0 0 0	7,500 2,600 6,150 0 0 0 0 0	7,500 2,600 6,150 0 0 0 0 0	7,500 2,600 6,150 0 0 0 0 0 0	7,500 2,600 6,150 0 0 0 0 0 0	90,400 31,425 73,800 0 0 0 0 0
TOTAL ALL PROGRAMS	18,125	16,050	11,925	19,400	10,125	23,000	15,750	16,250	16,250	16,250	16,250	16,250	195,625

SCHEDULE C - 3 PAGE 4 OF 5		COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#20210004-GU ENERGY CONSERVATION ADJUSTMENT											
					IANUARY 20								
CONSERVATION REVS.	JAN 2021	FEB 2021	MAR 2021	APR 2021	MAY 2021	JUN 2021	JUL 2021	AUG 2021	SEP 2021	OCT 2021	NOV 2021	DEC 2021	TOTAL
RCS AUDIT FEES a. OTHER PROG. REV. b.													
C.	-60,840	-46,380	-38,653	-31,140	-27,805	-23,179	-19,469	-23,047	-16,675	-18,193	-27,102	-33,484	-365,968
CONSERV. ADJ REV. (NET OF REV. TAXES)													
TOTAL REVENUES	-60,840	-46,380	-38,653	-31,140	-27,805	-23,179	-19,469	-23,047	-16,675	-18,193	-27,102	-33,484	-365,968
PRIOR PERIOD TRUE-UP NOT APPLIC. TO PERIOD	7,439	7,439	7,439	7,439	7,439	7,439	7,439	7,439	7,439	7,439	7,439	7,439	89,273
CONSERVATION REVS. APPLIC. TO PERIOD	-53,400	-38,941	-31,214	-23,701	-20,366	-15,740	-12,030	-15,608	-9,236	-10,754	-19,663	-26,044	-276,695
CONSERVATION EXPS. (FORM C-3, PAGE 3)	18,125	16,050	11,925	19,400	10,125	23,000	15,750	16,250	16,250	16,250	16,250	16,250	195,625
TRUE-UP THIS PERIOD	-35,275	-22,891	-19,289	-4,301	-10,241	7,260	3,720	642	7,014	5,496	-3,413	-9,794	-81,070
INTEREST THIS PERIOD (C-3,PAGE 5)	5	2	0	-1	-1	-1	-1	-2	-2	-2	-2	-2	-7
TRUE-UP & INT. BEG. OF MONTH	89,273	46,563	16,234	-10,493	-22,234	-39,915	-40,095	-43,816	-50,615	-51,042	-52,987	-63,841	
PRIOR TRUE-UP COLLECT./(REFUND.)	-7,439	-7,439	7,439	-7,439	-7,439	-7,439	-7,439	7,439	-7,439	-7,439	-7,439	-7,439	
END OF PERIOD TOTAL NET TRUE-UP	46,563	16,234	-10,493	-22,234	-39,915	-40,095	-43,816	50,615	-51,042	-52,987	63,841	81,077	-81,077

SCHEDULE C-3 COMPANY: ST. JOE NATURAL GAS PAGE 5 OF 5 EXHIBIT#DKS-2 DOCKET#20210004-GU CALCULATION OF TRUE-UP AND INTEREST PROVISION JANUARY 2021 THROUGH DECEMBER 2021 JAN **FEB** MAR APR MAY JUN JUL AUG SEP OCT NOV DEC INTEREST PROVISION 2021 2021 2021 2021 2021 2021 2021 2021 2021 2021 2021 2021 TOTAL BEGINNING TRUE-UP 89,273 46,563 16,234 -10,493-22,234-39,915 -40,095 -43.816 -50,615 -51.042 -52,987 -63,841 END. T-UP BEFORE INT. 46,558 16,233 -10,493-22,234 -39,914 -40,094 -43.815 -50.614 -51,040 -52,985 -63,839 -81.075 TOT. BEG. & END. T-UP 135,831 62.796 5,741 -32.727 -62,148 -80,009 -83,910 -94,430 -101,655 -104,027 -116,826 -144,916 AVERAGE TRUE-UP 67,916 31,398 2,871 -16.364 -31,074 -40,005 -41,955 -47,215 -50,828 -52,013 -58,413 -72,458INT. RATE-FIRST DAY OF REPORTING BUS. MTH 0.09% 0.07% 0.06% 0.04% 0.04% 0.03% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% INT. RATE-FIRST DAY OF SUBSEQUENT BUS, MTH 0.07% 0.06% 0.04% 0.04% 0.03% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% TOTAL 0.16% 0.13% 0.10% 0.08% 0.07% 0.07% 0.08% 0.08% 0.08% 0.08% 0.08% 0.08% AVG INTEREST RATE 0.08% 0.07% 0.05% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% 0.04% MONTHLY AVG. RATE 0.01% 0.01% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% 0.00% INTEREST PROVISION \$5 \$2 \$0 -\$1 -\$1 -\$1 -\$1 -\$2 -\$2 -\$2 -\$2 -\$2 -\$7 SCHEDULE C-4 PAGE 1 OF 3

ST JOE NATURAL GAS COMPANY, INC. PROGRAM DESCRIPTION AND PROGRESS

DOCKET NO. 20210004-GU ST JOE NATURAL GAS COMPANY (DKS)

PROGRAM TITLE:

PROGRAM DESCRIPTION:

RESIDENTIAL NEW CONSTRUCTION

This program is designed to increase the number of high priority firm natural gas customers in the new construction market. Incentives are offered in the form of cash allowances to assist builders in defraying the additional costs associated with natural gas appliance installations.

APPLIANCE LOAD	ALLOWANCE
GAS HEATING	\$500.00
GAS WATER HEATING	\$350.00
GAS CLOTHES DRYER	\$100.00
GAS RANGE	\$150.00
GAS TANKLESS W/HEATER	\$550.00
	\$1,650.00

PROGRAM PROJECTIONS FOR:

JANUARY 2021 THROUGH DECEMBER 2022

	GAS WATER HEATING	GAS HEATING	GAS DRYER	GAS RANGE	GAS TANKLESS W/H
JANUARY 2021 - DECEMBER 2021(12 MTHS)	1	11	18	53	117
JANUARY 2022 - DECEMBER 2022 (12 MTHS)	1	10	31	55	134

PROGRAM FISCAL EXPENSES FOR:

JANUARY 2020 - DECEMBER 2021

 JANUARY 21 - JULY 21
 ACTUAL EXPENSES
 52,900.00

 AUGUST 21 - DECEMBER 21
 ESTIMATED EXPENSES
 37,500.00

 JANUARY 2022 - DECEMBER 2022
 ESTIMATED EXPENSES
 90,400.00

PROGRAM PROGRESS SUMMARY:

New construction is booming in St Joe Natural Gas's service territory. By far the majority of new construction is by custom design where the owner specified to the builder the type of energy desired.

SCHEDULE C-4 PAGE 2 OF 3

ST JOE NATURAL GAS COMPANY, INC. PROGRAM DESCRIPTION AND PROGRESS

DOCKET NO. 20210004-GU ST JOE NATURAL GAS COMPA (DKS)

PROGRAM TITLE:

RESIDENTIAL APPLIANCE REPLACEMENT PROGRAM

PROGRAM DESCRIPTION:

This program is designed to promote the replacement of electric resistence appliances with energy efficient natural gas heaters, water heaters, air conditioners, dryers, ranges and tankless water heaters. Incentives are offered in the form of cash allowances to assist in defraying the additional costs in purchasing and installing natural gas appliances.

APPLIANCE LOAD	ALLOWANCE
GAS HEATING	\$725.00
GAS WATER HEATING	\$500.00
GAS CLOTHES DRYER	\$150.00
GAS RANGE	\$200.00
GAS TANKLESS W/HEATER	\$675.00
	\$2,250,00

PROGRAM PROJECTIONS FOR:

JANUARY 2021 THROUGH DECEMBER 2022

received by ratepayers in St Joe Natural Gas Company's service territory.

	GAS WATER HEATING	GAS HEATING	GAS DRYER		GAS RANGE	GAS TANKLES	
JANUARY 2021 - DECEMBER 2021(12 MTHS)	0		0	2		17	33
JANUARY 2022 - DECEMBER 2022 (12 MTHS)	0		0	6		21	39
PROGRAM FISCAL EXPENSES FOR:	J,	ANUARY 202	1 THE	ROUGH DECEMBE	ER 2022		
JANUARY 21 - JULY 21	ACTUAL EXPE	NSES		14,025.00			
AUGUST 21 - DECEMBER 21	ESTIMATED EX	XPENSES		17,400.00			
JANUARY 2022 - DECEMBER 2022	ESTIMATED EX	XPENSES		31,425.00			
PROGRAM PROGRESS SUMMARY:	_Replacement of	f electric appli	ances	with natural gas a	ppliances conf	tinues to be wel	t

SCHEDULE C-4 PAGE 3 OF 3 ST JOE NATURAL GAS COMPANY, INC. PROGRAM DESCRIPTION AND PROGRESS

DOCKET NO. 20210004-GU ST JOE NATURAL GAS COMPANY (DKS)

PROGRAM TITLE:

RESIDENTIAL APPLIANCE RETENTION PROGRAM

PROGRAM DESCRIPTION:

This program is designed to encourage homeowners with existing natural gas appliances to retain natural gas when the existing appliances fail, or are otherwise replaced. The proposed retention program includes allowances for natural gas water heater, heating, clothes drying, range, and tankless water heating systems.

APPLIANCE LOAD	ALLOWANCE		
GAS HEATING	\$500.00		
GAS WATER HEATING	\$350.00		
GAS CLOTHES DRYER	\$100.00		
GAS RANGE	\$100.00		
GAS TANKLESS W/HEATER	\$550.00		
	\$1,600.00		

PROGRAM PROJECTIONS FOR:

JANUARY 2020 - DECEMBER 2021

	GAS WATER HEATING	GAS HEATING	GAS DRYER	GAS RANGE	GAS TANKLESS W/H		
JANUARY 2021 - DECEMBER 2021(12 MTHS)	40	14	20	48	75		
JANUARY 2022 - DECEMBER 2022 (12 MTHS)	57	13	18	72	84		
PROGRAM FISCAL EXPENSES FOR:	JANUARY 2021 THROUGH DECEMBER 2022						
JANUARY 21 - JULY 21	ACTUAL EXPENSES		43,050.00				
AUGUST 21 - DECEMBER 21	ESTIMATED EXPENSES		30,750.00				
JANUARY 2022 - DECEMBER 2022	ESTIMATED E	XPENSES	81,650.00				
PROGRAM PROGRESS SUMMARY:	The Company recognizes that the cost to retain an existing customer is significantly lower than the cost to add a new customer. The proposed retention allowances will strengthen the Company's ability to retain existing gas customers and avoid the removal of services. This program has been well received by the customers as well.						