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Attorneys and Counselors at Law
123 South Calhoun Street
P.O. Box 391 32302
Tallahassee, FL 32301
P: (850) 224-9115
F: (850) 222-7560
ausley.com

August 5, 2022

VIA ELECTRONIC FILING

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

Re: Docket No. 20220004-GU
Peoples Gas System – Natural Gas Conservation Cost Recovery

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Peoples Gas System's Petition for approval of the Company's conservation cost recovery true-up and the cost recovery factors proposed for use during the period January through December 2023.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'V. Ponder'.

Virginia Ponder

VLP/ne
Attachment

cc: All parties of record (w/att.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost)
Recovery.)
_____)

DOCKET NO. 20220004-GU
FILED: August 5, 2022

PETITION OF PEOPLES GAS SYSTEM

Peoples Gas System ("Peoples" or "the Company"), by and through its undersigned counsel files this Petition for approval of the Company's conservation cost recovery true-up and the cost recovery factors proposed for use during the period January 1, 2023, through December 31, 2023. In support thereof, the Company says:

1. The name and address of the petitioner are:

Peoples Gas System
702 N. Franklin Street
Tampa, Florida 33602

2. The persons to whom notices, orders and pleadings in this docket should be addressed are:

Jeff Wahlen
jwahlen@ausley.com
Malcolm Means
mmeans@ausley.com
Virginia Ponder
vponder@ausley.com
Ausley McMullen
123 S. Calhoun St.
Tallahassee, FL 32301-1517

Paula K. Brown
regdept@tecoenergy.com
Manager, Regulatory Coordination
Peoples Gas System
Post Office Box 111
Tampa, Florida 33601-0111

Karen L. Bramley
klbramley@tecoenergy.com
Manager, Regulatory Affairs
Peoples Gas System
Post Office Box 2562
Tampa, Florida 33601-2562

Nora Bordine
nmbordine@tecoenergy.com
Director, Regulatory Affairs
Peoples Gas System
Post Office Box 2562
Tampa, Florida 33601-2562

Conservation Cost Recovery

1. During the period January through December 2021, Peoples incurred actual net conservation costs of \$16,999,771. The amount collected in the ECCR clause was \$18,190,266, and with the addition of regulatory assessment fees of \$91,408, totals \$18,281,674. The prior period true-up under-recovery of \$1,150,698 is deducted from \$18,281,674 to calculate the conservation revenue applicable to the period, which was \$17,130,976. The true-up amount for January through December 2021 was an under-recovery of \$601,758, including interest. (See Exhibit No. KLB-1; Schedule CT-1, Page 1 of 1 and CT-2, Page 1 of 3, filed May 2, 2022).

2. During the period January through December 2022, the Company anticipates incurring expenses of \$21,192,680. For the period, the total net true-up over-recovery is estimated to be \$3,542,588, including interest. (See Exhibit No. KLB-2; Schedule C-3, page 3 of 5).

3. For the forthcoming cost recovery period January through December 2023, Peoples projects its total incremental conservation costs to be \$21,880,913. Peoples' total true-up and projected expenditures for the projection period are estimated to be \$18,338,325, including true-up estimates for January through December 2023. Utilizing the rate design and cost allocation methodology approved by the Commission, the required conservation cost recovery factors are as follows:

<u>Rate Schedule</u>	<u>Cost Recovery Factors (Dollars per Therm)</u>
RS & RS-SG & RS-GHP	\$0.09056
SGS	\$0.05718
GS-1 & CS-SG & CS-GHP	\$0.02909
GS-2	\$0.02167
GS-3	\$0.01843
GS-4	\$0.01336

GS-5	\$0.00928
CSLS	\$0.01851

(See Exhibit No. KLB-2; Schedule C-1, Page 1 of 1)

4. Peoples is not aware of any disputed issues of material fact relating to the matters addressed or the relief requested in this petition.

WHEREFORE, Peoples Gas System requests the Commission's approval of the Company's prior period conservation cost recovery true-up calculations and projected conservation cost recovery charges to be collected during the period January 1, 2023, through December 31, 2023.

DATED this 5th day of August 2022.

Respectfully submitted,



JEFF WAHLEN
jwahlen@ausley.com
MALCOLM N. MEANS
mmeans@ausley.com
VIRGINIA PONDER
vponder@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115
ATTORNEYS FOR PEOPLES GAS SYSTEM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition, together with copies of the Direct Testimony of Karen L. Bramley and Exhibit KLB-2, filed on behalf of Peoples Gas System, has been furnished by electronic mail this 5th day of August 2022, to the following:

Matthew Jones
Theresa Tan
Office of General Counsel
Florida Public Service Commission
Room 390L – Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
majones@psc.state.fl.us
ltan@psc.state.fl.us

Richard Gentry
Charles J. Rehwinkel
Office of Public Counsel
111 West Madison Street – Room 812
Tallahassee, FL 32399-1400
gentry.richard@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Jerry H. Melendy
Sebring Gas System, Inc.
3515 Highway 27 South
Sebring, FL 33870-5452
jmelendy@floridasbestgas.com

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com
gmunson@gunster.com

Andy Shoaf
Debbie Stitt
St. Joe Natural Gas Company, Inc.
P.O. Box 549
Port St. Joe, FL 32457-0549
andy@stjoegas.com
dstitt@stjoegas.com

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
Christopher.Wright@fpl.com

Mike Cassel
Regulatory and Governmental Affairs
Florida Public Utilities Company
Florida Division of Chesapeake Utilities Corp.
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Paula Brown
Regulatory Affairs
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-01111
regdept@tecoenergy.com

Nora Bordine
Karen Bramley
Regulatory Affairs
Peoples Gas System
P.O. Box 2562
Tampa, FL 33601-2562
KLBramley@tecoenergy.com
regdept@tecoenergy.com



ATTORNEY



BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 20220004-GU
IN RE: NATURAL GAS CONSERVATION
COST RECOVERY CLAUSE

TESTIMONY AND EXHIBIT
OF
KAREN L. BRAMLEY

FILED: AUGUST 5, 2022

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **PREPARED DIRECT TESTIMONY**

3 **OF**

4 **KAREN L. BRAMLEY**

5
6 **Q.** Please state your name, business address, by whom you are
7 employed, and in what capacity?

8
9 **A.** My name is Karen L. Bramley. My business address is 702
10 North Franklin Street, Tampa, Florida 33602. I am
11 employed by Peoples Gas System ("Peoples") as Gas
12 Regulatory Manager, in the Regulatory Affairs Department.

13
14 **Q.** Please describe your educational and employment
15 background.

16
17 **A.** I graduated from the University of South Florida in 1990
18 with a Bachelor of Arts degree in Political Science and
19 from University of South Florida in 1993 with a Master's
20 degree in Public Administration. My work experience
21 includes twenty-four years of gas and electric utility
22 experience. My utility work has included various positions
23 in Legal, Customer Service, Fuels Management, and
24 Regulatory. In my current position, I am responsible for
25 Peoples Gas System's Natural Gas Conservation Cost Recovery

1 ("NGCCR") Clause and Purchased Gas Adjustment("PGA") Clause
2 as well as various other regulatory activities for Peoples.
3

4 **Q.** What is the purpose of your testimony in this docket?

5
6 **A.** The purpose of my testimony is to support Peoples' actual
7 conservation costs incurred during the period January
8 through December 2021, the actual/estimated period
9 January to December 2022, and the projected period January
10 through December 2023. The projected 2023 ECCR factors
11 have been calculated based on the current approved
12 allocation methodology.
13

14 **Q.** Are you sponsoring any exhibits with your testimony?

15
16 **A.** Yes, I am sponsoring Exhibit No. KLB-2 prepared under my
17 direction and supervision. This document consists of
18 Schedules C-1 through C-5 and associated data which
19 contain information which support the development of the
20 natural gas conservation cost recovery factors to be
21 applied to customer bills during the period January 2023
22 through December 2023.
23

24 **Q.** Does the Exhibit No. KLB-2 meet the requirements of Rule
25 25-17.015, Florida Administrative Code, which requires the

1 projection filing to include the annual estimated/actual
2 true-up filing showing actual and projected common costs,
3 individual program costs, and any revenues collected?
4

5 **A.** Yes, it does.
6

7 **Q.** What timeframe did Peoples Gas System develop its 2022
8 annual estimated/actual true-up filing?
9

10 **A.** Peoples Gas System developed its 2022 annual
11 estimated/actual true-up filing showing actual and
12 projected common costs, individual program costs, and any
13 revenues collected based upon six months of actuals and six
14 months of estimates.
15

16 **Q.** Please describe the conservation program costs projected by
17 Peoples during the period January through December 2021.
18

19 **A.** For the period January through December 2021, Peoples
20 projected conservation program costs to be \$19,277,040.
21 The Commission authorized collections to recover these
22 expenses in Docket No. 20210004-GU, Order No. PSC-2021-
23 0422-FOF-GU, issued November 9, 2021.
24

25 **Q.** For the period January through December 2021, what were

1 Peoples' conservation costs and what was recovered through
2 the ECCR clause?

3

4 **A.** For the period January through December 2021, Peoples
5 incurred actual net conservation costs of \$16,999,771. The
6 amount collected in the ECCR clause was \$18,190,266, and
7 with the addition of regulatory assessment fees of \$91,408,
8 totals \$18,281,674. The prior period true-up under-recovery
9 of \$1,150,698 is deducted from \$18,281,674 to calculate the
10 conservation revenue applicable to the period, which was
11 \$17,130,976.

12

13 **Q.** What is the true-up amount for Peoples for the period
14 January through December 2021?

15

16 **A.** Peoples' true-up amount for the period January through
17 December 2021 was an under-recovery of \$601,758,
18 including interest as detailed on Schedule CT-1 of Exhibit
19 No. KLB-1.

20

21 **Q.** Please describe the conservation program costs projected
22 to be incurred by Peoples during the period January
23 through December 2022?

24

25 **A.** The actual costs incurred by Peoples through June 2022

1 and projected for July through December 2022 are
2 \$21,192,680. For the period, Peoples anticipates an over-
3 recovery in the ECCR Clause of \$3,542,588 which includes
4 the 2021 true-up and interest. A summary of these costs
5 and estimates are fully detailed in Exhibit No. KLB-2,
6 Estimated Conservation Program Costs Per Program, pages
7 12 through 15.

8
9 **Q.** Please describe Peoples' progress in implementing the
10 Commercial Walkthrough Audit, as approved by the
11 Commission in Order No. 2019-0361-PAA-GU, issued on
12 August 26, 2019, in Docket No. 20180186-GU.

13
14 **A.** In December 2021, Peoples began a nationwide search to
15 increase the distribution list for a request for proposal
16 ("RFP") to be issued in 2022. Peoples held a pre-bid
17 meeting with prospective vendors in May 2022. Later that
18 month, the RFP was issued to nine contractors, and Peoples
19 received four proposals to provide the audit. Peoples has
20 developed a shortlist and is expecting to select a vendor
21 shortly. Peoples plans to begin offering the audit in the
22 4th quarter of 2022.

23
24 **Q.** Has Peoples initiated any projects in its Conservation
25 Research and Development Program?

1 **A.** Peoples has not begun any Research and Development
2 projects. However, the Company is currently exploring
3 research and development opportunities to implement in
4 2023.

5
6 **Q.** Please summarize the proposed conservation costs for the
7 period January through December 2023 and the annualized
8 recovery factors applicable for the period January through
9 December 2023?

10
11 **A.** Peoples has estimated that the total conservation costs
12 (less program revenues) during the period will be
13 \$21,880,913, plus true-up. Including true-up estimates,
14 the January through December 2023 conservation cost
15 recovery factors for retail rate classes are as follows:
16

	Cost Recovery Factors
<u>Rate Schedule</u>	<u>(Dollars per Therm)</u>
19 RS & RS-SG & RS-GHP	\$0.09056
20 SGS	\$0.05718
21 GS-1 & CS-SG & CS-GHP	\$0.02909
22 GS-2	\$0.02167
23 GS-3	\$0.01843
24 GS-4	\$0.01336
25 GS-5	\$0.00928

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CSLS

\$0.01851

Exhibit No. KLB-2, Schedule C-1, Page 1 of 1, Energy Conservation Adjustment, Summary of Cost Recovery Clause Calculation, contains the Commission-prescribed form which details these estimates.

Q. Does this conclude your testimony?

A. Yes, it does.

ENERGY CONSERVATION ADJUSTMENT
SUMMARY OF COST RECOVERY CLAUSE CALCULATION
MONTHS: January 2023 through December 2023

1. TOTAL INCREMENTAL COSTS (SCHEDULE C-2, PAGE 1)	21,880,913
2. TRUE-UP (SCHEDULE C-3, PAGE 3, LINE 11)	-3,542,588
3. TOTAL (LINE 1 AND LINE 2)	18,338,325

RATE SCHEDULE	BILLS	THERMS	CUSTOMER CHARGE	NON-GAS ENERGY CHARGE	TOTAL CUST. & ENGY CHG REVENUE	ECCR REVENUES	ECCR AS % OF TOTAL REVENUES	DOLLARS THERM	TAX FACTOR	CONSERV FACTOR
RS & RS-SG & RS-GHP	5,178,580	91,316,141	98,237,663	24,665,403	122,903,066	8,227,791	6.69454%	0.09010	1.00503	0.09056
SGS	151,815	10,078,017	4,645,539	3,920,046	8,565,585	573,426	6.69454%	0.05690	1.00503	0.05718
GS-1 & CS-SG & CS-GHIP	250,443	93,559,724	11,269,935	29,181,278	40,451,213	2,708,021	6.69454%	0.02894	1.00503	0.02909
GS-2	96,640	142,017,031	7,924,480	37,820,556	45,745,036	3,062,418	6.69454%	0.02156	1.00503	0.02167
GS-3	10,989	82,230,171	4,615,380	17,910,554	22,525,934	1,508,007	6.69454%	0.01834	1.00503	0.01843
GS-4	1,824	59,034,924	1,222,080	10,499,361.00	11,721,441	784,696	6.69454%	0.01329	1.00503	0.01336
GS-5	2,197	158,624,455	3,031,860	18,844,585	21,876,445	1,464,527	6.69454%	0.00923	1.00503	0.00928
NGVS	0	0	0	0	0	0	6.69454%	0.00000	1.00503	0.00000
CSLS	0	512,405	0	140,978	140,978	9,438	6.69454%	0.01842	1.00503	0.01851
TOTAL	5,692,488	637,372,868	130,946,937	142,982,761	273,929,698	18,338,325				



ESTIMATED CONSERVATION PROGRAM COSTS BY PROGRAM BY MONTH
January 2023 through December 2023

	PROGRAM	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
1	RESIDENTIAL CUSTOMER ASSISTED AUDIT	11,250	11,250	11,250	11,250	11,250	11,250	11,250	11,250	11,250	11,250	11,250	11,250	\$135,000
2	RESIDENTIAL NEW CONSTRUCTION	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	1,025,316	\$12,303,790
3	RESIDENTIAL RETROFIT	58,579	58,579	58,579	58,579	58,579	58,579	58,579	58,579	58,579	58,579	58,579	58,579	\$702,953
4	RESIDENTIAL RETENTION	326,009	326,009	326,009	326,009	326,009	326,009	326,009	326,009	326,009	326,009	326,009	326,009	\$3,912,110
5	COMMERCIAL WALKTHROUGH AUDIT	3,336	3,336	3,336	3,336	3,336	3,336	3,336	3,336	3,336	3,336	3,336	3,336	\$40,038
6	COMMERCIAL NEW CONSTRUCTION	46,100	46,100	46,100	46,100	46,100	46,100	46,100	46,100	46,100	46,100	46,100	46,100	\$553,200
7	COMMERCIAL RETROFIT	98,895	98,895	98,895	98,895	98,895	98,895	98,895	98,895	98,895	98,895	98,895	98,895	\$1,186,735
8	COMMERCIAL RETROFIT CHP	0	0	0	0	0	0	0	0	0	0	0	0	\$0
9	COMMERCIAL RETROFIT ELECTRIC REPLACEMENT	0	0	0	0	0	0	0	0	0	0	0	0	\$0
10	COMMERCIAL RETENTION	60,495	60,495	60,495	60,495	60,495	60,495	60,495	60,495	60,495	60,495	60,495	60,495	\$725,941
11	CONSERVATION R&D	833	833	833	833	833	833	833	833	833	833	833	833	\$10,000
12	COMMON COSTS	192,596	192,596	192,596	192,596	192,596	192,596	192,596	192,596	192,596	192,596	192,596	192,596	\$2,311,147
13	OIL HEAT REPLACEMENT	0	0	0	0	0	0	0	0	0	0	0	0	\$0
	TOTAL ALL PROGRAMS	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$1,823,409	\$21,880,913

6

ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM
January 2023 through December 2023

	PROGRAM	CAPITAL INVEST	PAYROLL & BENEFITS	MATERIALS & SUPPLIES	ADVERT	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1	RESIDENTIAL CUSTOMER ASSISTED AUDIT	0	0	0	0	0	135,000	0	0	\$135,000
2	RESIDENTIAL NEW CONSTRUCTION	0	0	0	0	12,303,790	0	0	0	\$12,303,790
3	RESIDENTIAL RETROFIT	0	0	0	0	702,953	0	0	0	\$702,953
4	RESIDENTIAL RETENTION	0	0	0	0	3,912,110	0	0	0	\$3,912,110
5	COMMERCIAL WALKTHROUGH AUDIT	0	0	0	0	0	40,038	0	0	\$40,038
6	COMMERCIAL NEW CONSTRUCTION	0	0	0	0	553,200	0	0	0	\$553,200
7	COMMERCIAL RETROFIT	0	0	0	0	1,186,735	0	0	0	\$1,186,735
8	COMMERCIAL RETROFIT CHP	0	0	0	0	0	0	0	0	\$0
9	COMMERCIAL RETROFIT ELECTRIC REPLACEMENT	0	0	0	0	0	0	0	0	\$0
10	COMMERCIAL RETENTION	0	0	0	0	725,941	0	0	0	\$725,941
11	CONSERVATION R&D	0	0	0	0	0	10,000	0	0	\$10,000
12	COMMON COSTS	0	618,596	0	1,400,000	0	220,812	0	71,739	\$2,311,147
13	OIL HEAT REPLACEMENT	0	0	0	0	0	0	0	0	\$0
	PROGRAM COSTS	\$0	\$618,596	\$0	\$1,400,000	\$19,384,729	\$405,849	\$0	\$71,739	\$21,880,913

ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM

Estimated For Months July 2022 through December 2022

PROGRAM	CAPITAL INVEST	PAYROLL BENEFITS	MATERIALS & SUPPLIES	ADVERT	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1 RESIDENTIAL CUSTOMER ASSISTED AUDIT									
A. ACTUAL	0	0	0	0	0	125,000	0	0	125,000
B. ESTIMATED	0	0	0	0	0	0	0	0	0
C. TOTAL	0	0	0	0	0	125,000	0	0	125,000
2 RESIDENTIAL NEW CONSTRUCTION									
A. ACTUAL	0	0	0	0	4,994,350	0	0	0	4,994,350
B. ESTIMATED	0	0	0	0	6,951,121	0	0	0	6,951,121
C. TOTAL	0	0	0	0	11,945,471	0	0	0	11,945,471
3 RESIDENTIAL RETROFIT									
A. ACTUAL	0	0	0	0	343,017	0	0	0	343,017
B. ESTIMATED	0	0	0	0	339,621	0	0	0	339,621
C. TOTAL	0	0	0	0	682,638	0	0	0	682,638
4 RESIDENTIAL RETENTION									
A. ACTUAL	0	0	0	0	1,918,760	0	0	0	1,918,760
B. ESTIMATED	0	0	0	0	1,909,033	0	0	0	1,909,033
C. TOTAL	0	0	0	0	3,827,793	0	0	0	3,827,793
5 COMMERCIAL WALKTHROUGH AUDIT									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	10,009	0	0	10,009
C. TOTAL	0	0	0	0	0	10,009	0	0	10,009
6 COMMERCIAL NEW CONSTRUCTION									
A. ACTUAL	0	0	0	0	387,240	0	0	0	387,240
B. ESTIMATED	0	0	0	0	331,920	0	0	0	331,920
C. TOTAL	0	0	0	0	719,160	0	0	0	719,160
7. COMMERCIAL RETROFIT									
A. ACTUAL	0	0	0	0	514,579	0	0	0	514,579
B. ESTIMATED	0	0	0	0	529,458	0	0	0	529,458
C. TOTAL	0	0	0	0	1,044,037	0	0	0	1,044,037
8. COMMERCIAL RETROFIT CHP									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
C. TOTAL	0	0	0	0	0	0	0	0	0
9. COMMERCIAL RETROFIT ELECTRIC REPLACEMENT									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
C. TOTAL	0	0	0	0	0	0	0	0	0
10. COMMERCIAL RETENTION									
A. ACTUAL	0	0	0	0	440,750	0	0	0	440,750
B. ESTIMATED	0	0	0	0	375,934	0	0	0	375,934
C. TOTAL	0	0	0	0	816,684	0	0	0	816,684
11. CONSERVATION R&D									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
C. TOTAL	0	0	0	0	0	0	0	0	0
12 COMMON COSTS									
A. ACTUAL	0	304,554	0	452,175	0	17,554	0	65,372	839,655
B. ESTIMATED	0	290,568	0	795,000	0	96,665	0	0	1,182,233
C. TOTAL	0	595,122	0	1,247,175	0	114,219	0	65,372	2,021,888
13 OIL HEAT REPLACEMENT									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
C. TOTAL	0	0	0	0	0	0	0	0	0
TOTAL	0	595,122	0	1,247,175	19,035,783	249,228	0	65,372	21,192,680

CONSERVATION PROGRAM COSTS BY PROGRAM
ACTUAL/ESTIMATED

Estimated For Months July 2022 through December 2022

PROGRAM NAME	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
RESIDENTIAL CUSTOMER ASSISTED AUDIT	0	0	125,000	0	0	0	0	0	0	0	0	0	\$125,000
RESIDENTIAL NEW CONSTRUCTION	1,112,350	750,575	1,785,850	572,200	436,325	337,050	2,085,336	1,668,269	903,646	903,646	834,135	556,090	\$11,945,471
RESIDENTIAL RETROFIT	59,300	45,492	49,425	76,575	57,075	55,150	56,604	56,604	56,604	56,604	56,604	56,604	\$682,638
RESIDENTIAL RETENTION	357,515	311,250	290,600	395,845	347,500	216,050	318,172	318,172	318,172	318,172	318,172	318,172	\$3,827,793
COMMERCIAL WALKTHROUGH AUDIT	0	0	0	0	0	0	0	0	2,502	2,502	2,502	2,502	\$10,009
COMMERCIAL NEW CONSTRUCTION	0	65,488	120,069	68,448	86,788	46,447	55,320	55,320	55,320	55,320	55,320	55,320	\$719,160
COMMERCIAL RETROFIT	63,077	76,503	179,512	69,685	59,903	65,898	88,243	88,243	88,243	88,243	88,243	88,243	\$1,044,037
COMMERCIAL RETROFIT CHP	0	0	0	0	0	0	0	0	0	0	0	0	\$0
COMMERCIAL RETROFIT ELECTRIC REPLACEME	0	0	0	0	0	0	0	0	0	0	0	0	\$0
COMMERCIAL RETENTION	19,500	99,250	101,000	143,500	63,500	14,000	62,656	62,656	62,656	62,656	62,656	62,656	\$816,684
CONSERVATION R&D	0	0	0	0	0	0	0	0	0	0	0	0	\$0
COMMON COSTS	24,079	73,554	274,513	146,794	258,183	62,532	197,039	197,039	197,039	197,039	197,039	197,039	\$2,021,888
OIL HEAT REPLACEMENT	0	0	0	0	0	0	0	0	0	0	0	0	\$0
RESIDENTIAL CUSTOMER ASSISTED AUDIT	0	0	0	0	0	0	0	0	0	0	0	0	\$0
COMMERCIAL WALK THROUGH ENERGY AUDIT	0	0	0	0	0	0	0	0	0	0	0	0	\$0
TOTAL ALL PROGRAMS	\$1,635,820	\$1,422,114	\$2,925,968	\$1,473,048	\$1,309,274	\$797,127	\$2,863,369	\$2,446,302	\$1,684,181	\$1,684,181	\$1,614,670	\$1,336,625	\$21,192,680

ENERGY CONSERVATION ADJUSTMENT

January 2022 through December 2022

CONSERVATION REVS.	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
RCS AUDIT FEES	-	-	-	-	-	-	-	-	-	-	-	-	-
a. OTHER PROG. REV.	(2,748,933)	(3,060,083)	(2,532,865)	(2,248,845)	(2,029,056)	(1,735,396)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(25,301,773)
b. CONSERV. ADJ. REV.	-	-	-	-	-	-	-	-	-	-	-	-	-
c.	-	-	-	-	-	-	-	-	-	-	-	-	-
CONSERV. ADJ REV. (NET OF REV. TAXES)	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL REVENUES	(2,748,933)	(3,060,083)	(2,532,865)	(2,248,845)	(2,029,056)	(1,735,396)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(1,824,432)	(25,301,773)
PRIOR PERIOD TRUE-UP NOT APPLIC. TO PERIOD	234,232	234,232	234,232	234,232	234,232	234,232	234,232	234,232	234,232	234,232	234,232	234,226	2,810,778
CONSERVATION REVS. APPLIC. TO PERIOD	(2,514,701)	(2,825,851)	(2,298,633)	(2,014,613)	(1,794,824)	(1,501,164)	(1,590,200)	(1,590,200)	(1,590,200)	(1,590,200)	(1,590,200)	(1,590,206)	(22,490,995)
CONSERVATION EXPS. (FORM C-3, PAGE 3)	1,635,820	1,422,114	2,925,968	1,473,048	1,309,274	797,127	2,863,369	2,446,302	1,684,181	1,684,181	1,614,670	1,336,625	21,192,680
TRUE-UP THIS PERIOD	(878,881)	(1,403,738)	627,335	(541,566)	(485,549)	(704,037)	1,273,169	856,102	93,981	93,981	24,470	(253,581)	(1,298,315)
REGULATORY ADJUSTMENTS													-
INTEREST THIS PERIOD (C-3,PAGE 5)	4	(213)	(586)	(1,115)	(2,257)	(4,470)	(5,396)	(4,186)	(3,839)	(4,050)	(4,313)	(4,831)	(35,254)
TRUE-UP & INT. BEG. OF MONTH	601,758	(511,351)	(2,149,534)	(1,757,017)	(2,533,930)	(3,255,968)	(4,198,707)	(3,165,166)	(2,547,482)	(2,691,572)	(2,835,874)	(3,049,950)	601,758
PRIOR TRUE-UP COLLECT./(REFUND.)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,232)	(234,226)	(2,810,778)
END OF PERIOD TOTAL NET TRUE-UP	(511,351)	(2,149,534)	(1,757,017)	(2,533,930)	(3,255,968)	(4,198,707)	(3,165,166)	(2,547,482)	(2,691,572)	(2,835,874)	(3,049,950)	(3,542,588)	(3,542,588)

CALCULATION OF TRUE-UP AND INTEREST PROVISION

January 2022 through December 2022

INTEREST PROVISION	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BEGINNING TRUE-UP	601,758	-511,351	-2,149,534	-1,757,017	-2,533,930	-3,255,968	-4,198,707	-3,165,166	-2,547,482	-2,691,572	-2,835,874	-3,049,950	-3,542,588
END. T-UP BEFORE INT.	-511,355	-2,149,321	-1,756,431	-2,532,815	-3,253,711	-4,194,237	-3,159,770	-2,543,296	-2,687,733	-2,831,823	-3,045,636	-3,537,757	-3,507,335
TOT. BEG. & END. T-UP	90,403	-2,660,672	-3,905,965	-4,289,832	-5,787,641	-7,450,205	-7,358,477	-5,708,462	-5,235,215	-5,523,395	-5,881,510	-6,587,707	-7,049,923
AVERAGE TRUE-UP	45,202	-1,330,336	-1,952,983	-2,144,916	-2,893,821	-3,725,103	-3,679,239	-2,854,231	-2,617,608	-2,761,698	-2,940,755	-3,293,854	-3,524,961
INT. RATE-FIRST DAY OF REPORTING BUS. MTH	0.0800%	0.1400%	0.2400%	0.4900%	0.7600%	1.1200%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%
INT. RATE-FIRST DAY OF SUBSEQUENT BUS. MTH	0.1400%	0.2400%	0.4900%	0.7600%	1.1200%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%
TOTAL	0.2200%	0.3800%	0.7300%	1.2500%	1.8800%	2.8800%	3.5200%	3.5200%	3.5200%	3.5200%	3.5200%	3.5200%	3.5200%
AVG INTEREST RATE	0.1100%	0.1900%	0.3650%	0.6250%	0.9400%	1.4400%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%	1.7600%
MONTHLY AVG. RATE	0.00900%	0.0160%	0.0300%	0.0520%	0.0780%	0.1200%	0.1467%	0.1467%	0.1467%	0.1467%	0.1467%	0.1467%	0.1467%
INTEREST PROVISION	\$4	-\$213	-\$586	-\$1,115	-\$2,257	-\$4,470	-\$5,396	-\$4,186	-\$3,839	-\$4,050	-\$4,313	-\$4,831	-\$35,254

PROGRAM DESCRIPTION AND PROGRESS

Program Title: RESIDENTIAL CUSTOMER ASSISTED ENERGY AUDIT

Program Description: A conservation program designed to save energy by increasing residential customer awareness of natural gas energy use in personal residences. This program allows for residential customers to engage in an online energy audit. Savings are dependent on the customer implementing energy conservation measure and practice recommendations. Recommendations provided to the customer includes an estimated range of energy savings including insightful advice on how to manage their overall energy usage.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 9,834 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 9,000 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$125,000.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$135,000.

**Program Progress
Summary:**

As of December 31, 2021, there have been 12,770 participants in this program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: RESIDENTIAL NEW CONSTRUCTION

Program Description: The Residential New Construction Program is designed to encourage builders and developers to construct new single family and multi-family homes with the installation of energy efficient natural gas appliances to help reduce the new customer's energy consumption and conserve energy resources. The rebates offered to builders and developers under this program are designed to assist in defraying the added cost of gas piping and venting. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 10,634 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 10,700 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$11,945,471.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$12,303,790.

**Program Progress
Summary:**

As of December 31, 2021, there have been 193,037 participants in the New Residential Construction program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: RESIDENTIAL RETROFIT

Program Description: The Residential Retrofit Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing residences with the installation of energy efficient natural gas appliances to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 1,407 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 1,442 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$682,638.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$702,953.

**Program Progress
Summary:**

As of December 31, 2021, there have been 31,125 participants in the Residential Appliance Replacement program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: RESIDENTIAL RETENTION

Program Description: The Residential Retention Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing residences with the installation of energy efficient natural gas appliances to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 9,808 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 10,042 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$3,827,793.

January 1, 2023 to December 31, 2023

Expenditures are estimated at \$3,912,110.

**Program Progress
Summary:**

As of December 31, 2021, there have been 217,582 participants in the Residential Appliance Retention program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL WALKTHROUGH ENERGY AUDIT

Program Description: A conservation program designed to reduce demand and energy consumption of commercial/industrial facilities by increasing customer awareness of the energy use in their facilities. The savings are dependent upon the customer's implementation of conservation measures and practices recommended. Recommendations are tailored to the specific commercial or industrial facility based upon the replacement of less efficient equipment and systems or modifications to operations to enhance the customer's overall efficiency.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 12 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 48 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$10,009.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$40,038.

**Program Progress
Summary:**

As of this filing, this program has not been launched. However, Peoples is planning to launch this program in the 4th quarter of 2022.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL NEW CONSTRUCTION

Program Description: The Commercial New Construction Program is designed to encourage builders and developers to construct commercial and industrial facilities with the installation of energy efficient natural gas equipment to help reduce the new customer's energy consumption and conserve energy resources. The rebates offered to builders and developers under this program are designed to assist in defraying the added cost of gas piping and venting. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 234 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 180 customers projected to participate.

Program Fiscal Expenditures:

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$719,160.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$553,200.

Program Progress Summary:

As of December 31, 2021, there have been 744 participants in the Commercial New Construction program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL RETROFIT

Program Description: The Commercial Retrofit Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy-efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 318 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 350 customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$1,044,037.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$1,186,735.

**Program Progress
Summary:**

As of December 31, 2021, there have been 2,214 participants in the Commercial Replacement program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL RETROFIT COMBINED HEAT AND POWER

Program Description: The Commercial Retrofit Combined Heat and Power Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas combined heat and power equipment to utilize waste heat to displace portions of natural gas usage for on-site heating, cooling, and water heating.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are zero customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are zero customers projected to participate.

**Program Fiscal
Expenditures:**

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$0.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$0.

**Program Progress
Summary:**

As of December 31, 2021, there have been 7 participants in the Commercial Retrofit Combined Heat and Power program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL RETROFIT ELECTRIC REPLACEMENT

Program Description: This Commercial Retrofit Electric Replacement Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy-efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are zero customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are zero customers projected to participate.

Program Fiscal Expenditures:

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$0.

January 1, 2023 to December 31, 2023

Expenditures are estimated at \$0.

Program Progress Summary:

As of December 31, 2020, there have been 60,481 kW displaced in the Commercial Electric Replacement program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMERCIAL RETENTION

Program Description: The Commercial Retention Program is designed to encourage current natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy-efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Projections: January 1, 2022 to December 31, 2022

During this period, there are 378 customers projected to participate.

January 1, 2023 to December 31, 2023

During this period, there are 336 customers projected to participate.

Program Fiscal Expenditures:

January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$816,684.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$725,941.

Program Progress Summary:

As of December 31, 2020, there have been 2,166 participants in the Commercial Retention program since its inception.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: CONSERVATION RESEARCH AND DEVELOPMENT

Program Description: The Conservation Demonstration and Development Program allows local distribution companies to pursue opportunities for individual and joint research, including testing of technologies to develop new energy conservation programs. R&D activity will be conducted on proposed measures to determine the impact to the company and its ratepayers and may occur at customer premises, Peoples Gas System facilities, or at independent test sites.

Program Projections: See Program Progress Summary.

Program Fiscal Expenditures: January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$0.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$10,000.

Program Progress Summary: The company continues to review possible programs to research.

PROGRAM DESCRIPTION AND PROGRESS

Program Title: COMMON EXPENSES

Program Description: These are expenses related to the support, delivery, and advertising of all Peoples Gas System's conservation programs.

Program Projections: N/A

Program Fiscal Expenditures: January 1, 2022 to December 31, 2022

Expenditures are estimated to be \$2,021,888.

January 1, 2023 to December 31, 2023

Expenditures are estimated to be \$2,311,147.

Program Progress Summary: N/A