#### 1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2 In Re: Conservation Cost ) Docket No.110004-GU
Recovery Clause ) Submitted for Filing
3 September 12, 2011

4

6

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 A. 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 A. My purpose is to submit the known and projected expenses and
- 14 revenues associated with SJNG's conservation programs incurred
- 15 in January thru August 2011 and projection costs to be incurred
- from September 2011 through December 2011. It will also include
- 17 projected conservation costs for the period January 1, 2012
- 18 through December 31, 2012 with a calculation of the conservation
- 19 adjustment factors to be applied to the customers' bills during
- 20 the January 1, 2012 through December 31, 2012 period.
- 21 Q. Have you prepared any exhibits in conjunction with your testimony?
- 22 A. Yes, I have prepared and filed to the Commission the 12th day of
- 23 September 2011 Schedule C-1 prescribed by the Commission Staff
  - which has collectively been titled Energy Conservation Adjustment
    - Summary of Cost Recovery Clause Calculation for months January

COM 24
APA 25
ECR 25
GCL 1
RAD SRC ADM OPC

DOCUMENT NUMBER - PATE

06615 SEP 14 =

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1, 2012 through December 31, 2012 for identification.
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- 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, 2012?
- 5 A. \$.07304 per therm for RS-1, \$.04868 per therm for RS-2, and
- \$.03777 per therm for RS-3, \$0.03006 per therm for GS-1, \$0.01597
- per therm for GS-2, and \$0.00702 per therm for GS-4/FTS-4
- 8 Q. Does this conclude your testimony?
- 9 A. Yes.

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

	)	September 12, 201
Recovery	)	Submitted for Filin
In Re: Conservation Cost	)	Docket No. 110004-G

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Testimony have been served upon all known parties of record in this docket by U.S. Mail dated this 12th day of September 2011.

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Florida City Gas Mr. Melvin Williams 933 East 25<sup>th</sup> St Hialeah, Fl 33013-3403 SCHEDULE C-1 PAGE 1 OF 1 COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU

# ENERGY CONSERVATION ADJUSTMENT SUMMARY OF COST RECOVERY CLAUSE CALCULATION MONTHS: JANUARY 2012 THROUGH DECEMBER 2012

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

80,250

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

-38,078

3. TOTAL (LINE 1 AND LINE 2)

42,172

					TOTAL					
DATE.		TUED!	CUSTOMER	DEL II (ED) (	CUST. &	5000	ECCR AS %	5011450	T. V	00110551
RATE	DILLO	THERM	CHARGE	DELIVERY	DELIVERY CHG	ECCR	OF TOTAL	DOLLARS	TAX	CONSERV
SCHEDULE	BILLS	SALES	REVENUES	CHARGE	REVENUE	REVENUES	REVENUES	THERM	FACTOR	FACTOR
RS-1	10,683	100,762	138,879	70,978	209,857	7,323	3.48932%	0.07267	1.00503	0.07304
RS-2	11,071	215,803	177,136	122,423	299,559	10,453	3.48932%	0.04844	1.00503	0.04868
RS-3	10,378	362,141	207,560	182,450	390,010	13,609	3.48932%	0.03758	1.00503	0.03777
GS-1	2,202	105,484	44,040	46,393	90,433	3,155	3.48932%	0.02991	1.00503	0.03006
GS-2	442	225,257	30,940	71,634	102,574	3,579	3.48932%	0.01589	1.00503	0.01597
FTS4/GS-4	24	580,194	48,000	68,167	116,167	4,053	3.48932%	0.00699	1.00503	0.00702
FTS-5	0	0	0	0	0	0	3.48932%	#DIV/0!	1.00503	#DIV/0!
TOTAL	34,800	1,589,641	646,555	562,045	1,208,600	42,172				

SCHEDULE C-2 PAGE 1 OF 2 COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU

### ESTIMATED CONSERVATION PROGRAM COSTS BY PROGRAM BY MONTH JANUARY 2012 THROUGH DECEMBER 2012

PROGRAM	JAN 2012	FEB 2012	MAR 2012	APR 2012	MAY 2012	JUN 2012	JUL 2012	AUG 2012	SEP 2012	OCT 2012	NOV 2012	DEC 2012	TOTAL
1 RESIDENTAL NEW CONSTRUCTION 2 RESIDENTIAL APPL. REPLACEMENT 3 RESIDENTAL APPL. RETENTION 4 CONSERVATION EDUC 5 COMMON COSTS 6 (INSERT NAME) 7 (INSERT NAME) 8 (INSERT NAME) 9 (INSERT NAME) 10 (INSERT NAME) 11 (INSERT NAME)	775 1,342 4,571 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0 0	775 1,342 4,571 0 0 0 0 0 0	9,300 16,100 54,850 0 0 0 0 0
TOTAL ALL PROGRAMS	6,688	6,688	6,688	6,688	6,688	6,688	6,688	6,688	6,688	6,688	6,688	6,688	80,250

SCHEDULE C - 2 PAGE 2 OF 2 COMPANY: ST. JOË NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU

## ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM JANUARY 2012 THROUGH DECEMBER 2012

PROGRAM	CAPITAL INVEST	PYROLL & BENEFITS	MATERLS. & SUPPLIES	ADVERT	I <u>NCENTIVE</u> S	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1 RESIDENTAL NEW CONSTRUCTION	0	0	0	0	9,300	0	0	0	9,300
2 RESIDENTIAL APPL, REPLACEMENT	0	0	0	0	16,100	0	0	0	16,100
3 RESIDENTAL APPL. RETENTION	0	0	0	0	54,850	0	0	0	54,850
4 CONSERVATION EDUC	0	0	0	0	0	0	0	0	0
5 COMMON COSTS	0	0	0	0	0	0	0	0	0
6 (INSERT NAME)	0	0	0	0	0	0	0	0	0
7 (INSERT NAME)	0	0	0	0	0	0	0	0	0
8 (INSERT NAME)	0	0	0	0	0	0	0	0	0
9 (INSERT NAME)	0	0	0	0	0	0	0	0	0
10 (INSERT NAME)	0	0	0	0	0	0	0	0	0
11 (INSERT NAME)	0	0	0	0	0	0	0	0	0
PROGRAM COSTS	0	0	0	0	80,250	0	0	0	80,250

COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU

# ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM JANUARY 2011 THROUGH DECEMBER 2011

PROGRAM	CAPITAL INVEST	PYROLL & BENEFITS	MATERLS. & SUPPLIES	ADVERT	I <u>NCENTIVE</u> S	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1 RESIDENTAL NEW CONSTRUCTION									
A. ACTUAL	0	0	0	0	3,900	0	0	0	3,900
B. ESTIMATED	0	0	0	0	2,200	0	0	0	2,200
TOTAL	0	0	0	0	6,100	0	0	0	6,100
2 RESIDENTIAL APPL. REPLACEMENT									
A. ACTUAL	0	0	0	0	19,925	0	0	0	19,925
B. ESTIMATED	0	0	0	0	6,500	0	0	0	6,500
TOTAL	0	0	0	0	26,425	0	0	0	26,425
3 RESIDENTAL APPL. RETENTION									
A. ACTUAL	0	0	0	0	50,050	0	0	0	50,050
B. ESTIMATED	0	0	0	0	20,000	0	0	0	20,000
TOTAL	0	0	0	0	70,050	0	0	0	70,050
4 OUTSIDE SERVICES									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0
5 (INSERT NAME)									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0
6 (INSERT NAME)									
A. ACTUAL	0	0	0	0	0	0	0	0	0
B. ESTIMATED	0	0	0	0	Ö	0	0	ŭ	ő
C. TOTAL	0	0	0	0	0	0	0	0	0
O. TOTAL									
SUB-TOTAL	0	0	0	0	102,575	0	0	0	102,575

SCHEDULE C - 3 PAGE 2 OF 5 COMPANY: ST. JOE NATURAL GAS

EXHIBIT#DKS-2 DOCKET#110004-GU

# ESTIMATED CONSERVATION PROGRAM COSTS PER PROGRAM JANUARY 2011 THROUGH DECEMBER 2011

	PROGRAM NAME	CAPITAL INVEST	PYROLL & BENEFITS	MATERLS. & SUPPLIES	ADVERT	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
1	- · · · · · · · · · · · · · · · · ·									
	SUB-TOTAL - PREVIOUS PAGE	0	0	0	0	102,575	0	0	0	102,575
	7. A. ACTUAL	0	0	0	0	0	0	0	0	0
ı	B. ESTIMATED	0	0	0	0	0	0	0		0
l	(INSERT NAME 1-30 LETTERS)	0	0	0	0	0	0	0	0	0
l	(INSERT NAME)									
ı	8. A. ACTUAL	0	0	0	0	0	0	0	0	0
1	B. ESTIMATED	0	0	0	0	0	0	0	0	0
	(INSERT NAME 1-30 LETTERS)	0	0	0	0	0	0	0	0	0
	(INSERT NAME)									
۱	9. À. ACTUAL	0	0	0	0	0	0	0	0	0
١	B. ESTIMATED	0	0	0	Ō	Ō	0	Ō	0	0
١	(INSERT NAME 1-30 LETTERS)	0	0	0	Ō	0	0	Ō	ō	Ö
	(INSERT NAME)									
ı	10. A. ACTUAL	0	0	0	0	0	0	0	0	0
ı	B. ESTIMATED	ñ	Ö	Ō	0	Ö	Ö	ő	J	0
ı	C. TOTAL	ő	0	Ö	0	ő	0	Ö	0	Ö
		_	_	_	-	_	_	_	_	_
ı	(INSERT NAME)									
ľ	11. A. ACTUAL	0	0	0	0	0	0	0	0	0
ı	B. ESTIMATED	0	0	0	0	0	0	0	0	0
١	C. TOTAL	0	0	0	0	0	0	0	0	0
	TOTAL	0	0	0	0	102,575		0	0	102,575
	IOIAL					102,575				102,373

SCHEDULE C-3 PAGE 3 OF 5 COMPANY: ST. JOE NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU

#### CONSERVATION PROGRAM COSTS BY PROGRAM ACTUAL/ESTIMATED JANUARY 2011 THROUGH DECEMBER 2011

PROGRAM NAME	JAN 2011	FEB 2011	MAR 2011	APR 2011	MAY 2011	JUN 2011	JUL 2011	AUG 2011	SEP 2011	OCT 2011	NOV 2011	DEC 2011	TOTAL
RESIDENTAL NEW CONSTRUCTION	0	1,000	550	1,550	800	0	0	0	550	550	550	550	6,100
RESIDENTIAL APPL. REPLACEMENT	8,225	2,650	1,225	1,850	1,700	4,125	0	150	1,625	1,625	1,625	1,625	26,425
RESIDENTAL APPL. RETENTION	7,900	6,750	5,800	6,500	4,850	6,900	5,500	5,850	5,000	5,000	5,000	5,000	70,050
OUTSIDE SERVICES	0	0	0	0	0	0	0	0	0	0	0	0	0
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	이
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	ol
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	ol
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	o
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	o
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	ol
(INSERT NAME)	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL ALL PROGRAMS	16,125	10,400	7,575	9,900	7,350	11,025	5,500	6,000	7,175	7,175	7,175	7,175	102,575

SCHEDULE C - 3 PAGE 4 OF 5							ON ADJUSTN		COMPANY: ST. JÖE NATURAL GAS EXHIBIT#DKS-2 DOCKET#110004-GU				
				J	ANOART 20	II IAKOUG	DECEMBI	ER 2011					
CONSERVATION REVS.	JAN 2011	FEB 2011	MAR 2011	APR 2011	MAY 2011	JUN 2011	JUL 2011	AUG 2011	SEP 2011	OCT 2011	NOV 2011	DEC 2011	TOTAL
RCS AUDIT FEES a. OTHER PROG. REV. b.													
С.	-43,423	-32,812	-31,902	-20,425	-10,100	-8,487	-9,724	-7,894	-7,320	-9,671	-12,218	-22,745	-216,722
CONSERV. ADJ REV. (NET OF REV. TAXES)													
TOTAL REVENUES	-43,423	-32,812	-31,902	-20,425	-10,100	-8,487	-9,724	-7,894	-7,320	-9,671	-12,218	-22,745	-216,722
PRIOR PERIOD TRUE-UP NOT APPLIC. TO PERIOD	6,338	6,338	6,338	6,338	6,338	6,338	6,338	6,338	6,338	6,338	6,338	6,338	76,059
CONSERVATION REVS. APPLIC. TO PERIOD	-37,085	-26,474	-25,564	-14,087	-3,762	-2,149	-3,385	-1,556	-981	-3,333	-5,880	-16,407	-140,663
CONSERVATION EXPS. (FORM C-3, PAGE 3)	16,125	10,400	7,575	9,900	7,350	11,025	5,500	6,000	7,175	7,175	7,175	7,175	102,575
TRUE-UP THIS PERIOD	-20,960	-16,074	-17,989	-4,187	3,588	8,876	2,115	4,444	6,194	3,842	1,295	-9,232	-38,088
INTEREST THIS													
PERIOD (C-3,PAGE 5)	13	8	3	-1	-1	-1	-1	-1	-1	-2	-2	-3	9
TRUE-UP & INT. BEG. OF MONTH	76,059	48,774	26,370	2,046	-8,480	-11,232	-8,696	-12,921	-14,816	-14,962	-17,460	-22,505	
PRIOR TRUE-UP COLLECT./(REFUND.)	6,338_	-6,338	-6,338	-6,338	-6,338	-6,338	-6,338	-6,338	-6,338	-6,338	6,338	-6,338	
END OF PERIOD TOTAL NET TRUE-UP	48,774	26,370	2,046	8,480	-11,232	-8,696	-12,921	-14,816	-14,962	17,460	-22,505	-38,078	-38,078

COMPANY: ST. JOE NATURAL GAS SCHEDULE C-3 PAGE 5 OF 5 EXHIBIT#DKS-2 DOCKET#110004-GU CALCULATION OF TRUE-UP AND INTEREST PROVISION JANUARY 2011 THROUGH DECEMBER 2011 NOV DEC JAN FEB MAR APR MAY JUN JUL AUG SEP OCT 2011 INTEREST PROVISION 2011 2011 2011 2011 2011 2011 2011 2011 2011 2011 2011 BEGINNING TRUE-UP 76.059 48.774 26,370 2.046 -8.480 -11.232 -8.696 -12.921 -14.816 -14.962 -17,460 -22,505 END. T-UP BEFORE INT. 48,761 26,362 2.043 -8,480 -11,231 -8,694 -12,919 -14,814 -14,960 -17,458 -22,503 -38,075 -39,962 TOT, BEG. & END, T-UP 124,820 75,136 28,413 -6.434 -19,711 -19,927 -21,615 -27,735 -29,776 -32,420 -60.580 AVERAGE TRUE-UP 62,410 37,568 14,206 -3,217 -9,856 -9,963 -10,808 -13,868 -14,888 -16,210 -19.981 -30,290 INT. RATE-FIRST DAY OF 0.20% 0.12% 0.12% 0.12% 0.12% REPORTING BUS, MTH 0.25% 0.25% 0.25% 0.19% 0.16% 0.16% 0.12% INT. RATE-FIRST DAY OF 0.12% 0.12% 0.12% SUBSEQUENT BUS, MTH 0.25% 0.25% 0.20% 0.19% 0.16% 0.16% 0.12% 0.12% 0.12% TOTAL 0.50% 0.50% 0.45% 0.39% 0.35% 0.32% 0.28% 0.24% 0.24% 0.24% 0.24% 0.24% 0.25% 0.23% 0.20% 0.14% 0.12% 0.12% 0.12% 0.12% 0.12% AVG INTEREST RATE 0.25% 0.18% 0.16% 0.02% 0.01% 0.01% 0.01% 0.01% 0.01% 0.01% 0.01% 0.02% 0.02% 0.02% 0.01% MONTHLY AVG. RATE

INTEREST PROVISION

\$13

\$8

\$3

-\$1

-\$1

-\$1

-\$1

-\$1

-\$1

TOTAL

-\$2

-\$3

\$9

-\$2

SCHEDULE C-4
PAGE 1 OF 3

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

DOCKET NO. 110004-GU ST JOE NATURAL GAS COMPANY (DKS)

PROGRAM TITLE:

RESIDENTIAL NEW CONSTRUCTION

PROGRAM DESCRIPTION:

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	NEW ALLOW.
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 2011 THROUGH DECEMBER 2012

	GAS WATER HEATING	GAS HEATING	GAS DRYER	GAS RANGE	GAS TANKLESS W/H
JANUARY 2011 - DECEMBER 2011 (12 MTHS)	3	3	2		4 5
JANUARY 2012 - DECEMBER 2012 (12 MTHS	) 4	5	4	•	4 8
PROGRAM FISCAL EXPENSES FOR:	JANUARY 11 - D	ECEMBER 12			
JANUARY 11 - AUGUST 11 ACTI	UAL EXPENSES	3,900.00			
SEPTEMBER 11 - DECEMBER 11 ESTI	MATED EXPENSES	2,200.00			
JANUARY 2012 - DECEMBER 2012 ESTI	MATED EXPENSES	9,300.00			

PROGRAM PROGRESS SUMMARY:

New construction is very limited 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. 110004-GU ST JOE NATURAL GAS COMPANY (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.

	JAN 2011
APPLIANCE LOAD	NEW ALLOW.
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 2011 THROUGH DECEMBER 2012

	GAS WATER HEATING			GAS RANGE		
JANUARY 2011 - DECEMBER 2011 (12 MTHS)	20	4	12		8	15
JANUARY 2012 - DECEMBER 2012 (12 MTHS)	12	2	6		5	10
PROGRAM FISCAL EXPENSES FOR:	JANUARY 2011 THROUGH DECEMBER 2012					
JANUARY 11 - AUGUST 11	ACTUAL EXPENSES		19,925.00			
SEPTEMBER 11 - DECEMBER 11	ESTIMATED EXPENSES		6,500.00			
JANUARY 2012 - DECEMBER 2012	ESTIMATED EXPENSES		16,100.00			
PROGRAM PROGRESS SUMMARY:	<u> </u>	• •	ces with natural ga	• •		be well

SCHEDULE C-4
PAGE 3 OF 3

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

DOCKET NO. 110004-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.

	JAN 2011
APPLIANCE LOAD	NEW ALLOW.
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 11 - DECEMBER 12

This program has been well received by the customers as well.

	GAS WATER GAS GAS HEATING HEATING DRYER			GAS RANGE	GAS TANKLESS W/H		
JANUARY 2011 - DECEMBER 2011 (12 MTHS)	107	31	25		36	20	
JANUARY 2012 - DECEMBER 2012 (12 MTHS)	100	25	15		20	7	
PROGRAM FISCAL EXPENSES FOR:	JANUARY 2011 THROUGH DECEMBER 2012						
JANUARY 11 - AUGUST 11	ACTUAL EXPENSES		50,050.00				
SEPTEMBER 11 - DECEMBER 11	ESTIMATED E	XPENSES	20,000.00	20,000.00			
JANUARY 2012 - DECEMBER 2012	ESTIMATED EXPENSES		54,850.00				
PROGRAM PROGRESS SUMMARY:	than the cost to	add a new custo	e cost to retain an e mer. The proposed kisting gas customer	retention allow	vances will st	rengthen	