

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** October 24, 2019

**TO:** Office of Commission Clerk (Teitzman)

**FROM:** Division of Economics (Ward, Coston) *OW*  
Division of Accounting and Finance (Hightower) *EJS*  
Office of the General Counsel (Lherisson, Crawford) *ALM*  
*DBB*  
*JSC*

**RE:** Docket No. 20190173-GU – 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.

**AGENDA:** 11/05/19 – Regular Agenda – Tariff Filing – Interested Persons May Participate

**COMMISSIONERS ASSIGNED:** All Commissioners

**PREHEARING OFFICER:** Administrative

**CRITICAL DATES:** 60-Day suspension date waived by the utility until 11/5/2019

**SPECIAL INSTRUCTIONS:** None

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## Case 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.<sup>1</sup> 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.<sup>2</sup> The current GRIP charges for January through December 2019 were approved in Order No. PSC-2018-0547-TRF-GU.<sup>3</sup>

On October 8, 2019, the companies filed responses to staff's first data request. On October 11, 2019, the companies filed responses to 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 proposed tariff sheets are contained in Attachment B (FPUC), Attachment C (Chesapeake), and Attachment D (Fort Meade). The Commission has jurisdiction over this matter pursuant to Sections 366.03, 366.04, 366.05, and 366.06, F.S.

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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 Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.*

## Discussion of Issues

**Issue 1:** Should the Commission approve FPUC's, Fort Meade's, and Chesapeake's proposed GRIP surcharges for the period January through December 2020?

**Recommendation:** Yes, the Commission should approve FPUC's, Chesapeake's, and Fort Meade's proposed GRIP surcharges for the period January through December 2020. Furthermore, staff recommends the Commission direct the Company to determine if the WACC complies with the normalization rules to avoid a normalization violation. Additionally, if an adjustment to the WACC is necessary, staff recommends any adjustment be made in a subsequent true-up filing. (Ward, Hightower)

**Staff Analysis:** 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 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 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 1-1 shows FPUC’s 2020 revenue requirement calculation.

**Table 1-1**  
**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	1,941,074
2020 Revenue Requirement	\$12,112,394
Less Revenue Requirement in Base Rates	747,727
2020 GRIP Revenue Requirement	\$11,364,667
Less 2019 Over-recovery	1,513,182
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 1-2 shows Chesapeake’s 2020 revenue requirement calculation.

**Table 1-2  
 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.

Date: October 24, 2019

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, staff recommends that the companies 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.

Commission staff reviewed the companies' weighted average cost of capital (WACC), as filed in its petition. In their response to the 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. Staff recommends the Commission 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, staff recommends any adjustment be made in a subsequent true-up filing.

### **Conclusion**

Staff believes the calculation of the 2020 GRIP surcharge revenue requirement and the proposed GRIP surcharges for FPUC, Chesapeake, and Fort Meade are reasonable and accurate. Staff recommends approval of FPUC's, Chesapeake's, and Fort Meade's proposed GRIP surcharges for the period January through December 2020. Furthermore, staff recommends the Commission direct the Company to determine if the WACC complies with the normalization rules to avoid a normalization violation. Additionally, if an adjustment to the WACC is necessary, staff recommends any adjustment be made in a subsequent true-up filing.

**Issue 2:** Should this docket be closed?

**Recommendation:** Yes. If Issue 1 is approved and a protest is filed within 21 days of the issuance of the order, the tariffs should remain in effect, with any revenues held subject to refund, pending resolution of the protest. If no timely protest is filed, this docket should be closed upon the issuance of a consummating order. (Lherisson)

**Staff Analysis:** If Issue 1 is approved and a protest is filed within 21 days of the issuance of the order, the tariffs should remain in effect, with any revenues held subject to refund, pending resolution of the protest. If no timely protest is filed, this docket should be closed upon the issuance of a consummating order.

**FPUC, Chesapeake, and Fort Meade Pipe Replacement Program Progress**

Table 1										
FPUC Pipe Replacement Program Progress										
Mains (Miles)						Number of Services				
Year	Replaced	Replaced	Remaining	Remaining	Total	Replaced	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	Replaced	Remaining	Remaining	Total	Replaced	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 192 (4th Qtr of 2016). The net equals -81.

  

Table 3										
Fort Meade Pipe Replacement Program Progress										
Mains (Miles)						Number of Services				
Year	Replaced	Replaced	Remaining	Remaining	Total	Replaced	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	<u>\$0.2135622312</u>
Schedule GS-1	<u>\$0.1367214188</u>
Rate Schedule GS-2	<u>\$0.1367214188</u>
Rate Schedule GSTS-1	<u>\$0.1367214188</u>
Rate Schedule GSTS-2	<u>\$0.1367214188</u>
Rate Schedule LVS	<u>\$0.0860609269</u>
Schedule LVTS	<u>\$0.0860609269</u>
Schedule IS	<u>\$0.0583005864</u>
Schedule ITS	<u>\$0.0583005864</u>
Schedule GLS	<u>\$0.3746949288</u>
Rate Schedule GLSTS	<u>\$0.3746949288</u>
Rate Schedule NGV	<u>\$0.1367214188</u>
Rate Schedule NGVTS	<u>\$0.1367214188</u>

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.

*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, 2019 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	\$0.1359310585
FTS-2	> 500 therms up to 1,000 therms	\$0.1460711969
FTS-2.1	> 1,000 therms up to 2,500 therms	\$0.1388811818
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	\$0.1589714575
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

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*RATE SCHEDULES*  
*MONTHLY RATE ADJUSTMENTS*

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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~~

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*BILLING ADJUSTMENTS*

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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	<del>\$0.2938224865</del>
Rate Schedule GS-1	<del>\$0.088837705</del>
Rate Schedule GS-2	<del>\$0.08883-07705</del>
Rate Schedule GSTS-1	<del>\$0.08883-07705</del>
Rate Schedule GSTS-2	<del>\$0.08883-07705</del>
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

Issued by: ~~Jeffrey Householder~~Kevin Webber, President

Effective: JAN-01-2019