BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

April 1	, 2004	
IN RE:)	
RBS GAS UTILITY, INC. ACTUAL COST)	DOCKET NO.
ADJUSTMENT (ACA) AUDIT)	03-00389

ORDER ADOPTING ACA AUDIT REPORT OF TENNESSEE REGULATORY AUTHORITY'S ENERGY AND WATER DIVISION

This matter came before Chairman Deborah Taylor Tate, Director Pat Miller and Director Sara Kyle of the Tennessee Regulatory Authority (the "Authority" or "TRA"), the voting panel assigned to this Docket, at a regularly scheduled Authority Conference held on December 8, 2003, for consideration of the report of the TRA's Energy and Water Division (the "Staff") resulting from the Staff's audit of the annual deferred gas cost account filing by RBS Gas Utility, Inc. ("RBS" or the "Company") for the twelve month period ending February 28, 2003. The Actual Cost Adjustment Audit Report (the "Report"), attached hereto as Exhibit A, contains the audit findings of the Staff, the responses thereto of the Company, and the recommendations of the Staff to the Company in addressing the findings.

The Company submitted its ACA filing on June 4, 2003. The Staff completed its audit of this filing on October 28, 2003 and filed its Report with the Authority on November 13, 2003 with a total of six findings as detailed below. First, the Company did not bill the monthly customer charge of \$5.00 to four customers - a church, a school, a government agency, and a hospital – even though the Company's tariff does not make any such exceptions. This error had

no effect on the balance in the ACA account. Second, the Company used an incorrect beginning balance in its calculation of the balance in the ACA Account as of February 28, 2003. This error resulted in a \$1,849.92 over-recovery in the ACA Account. Third, the Company reported incorrect gas costs for the month of March 2002. Staff determined that the use of the correct cost would result in a \$5,388.93 over-recovery in the ACA Account. Fourth, for the months of August 2002 through February 2003, the Company used a positive \$0.1565 factor to calculate the ACA recoveries each month but should have used a factor of negative \$0.1565.1 The correction of this error resulted in a \$6,245.29 under-recovery in the ACA Account.² Fifth, for the months of March 2002 through June 2002, the Company used a positive \$2.6095 factor to calculate the purchased gas adjustment ("PGA") recoveries each month instead of a factor of positive \$2.71230 that was calculated in Tariff Filing No. 01-00584. Correction of this error resulted in a \$540.83 over-recovery in the ACA Account.³ Sixth, the Company over-recovered interest from its customers in a total amount of \$313.04. The Company used incorrect interest rates in its calculations for the first and second quarter of 2002 and the first quarter of 2003, resulting in a \$2.37 under-recovery in the ACA Account. An additional miscalculation of interest resulted from the other five errors mentioned above, which caused a \$315.41 overrecovery in the ACA Account. Despite these findings, Staff concluded that RBS is, for the most part, implementing its PGA rider, as calculated in the actual cost adjustment, in accordance with TRA rules since the errors, in total, represent only 1.2% of the Company's total gas invoices.

_

¹ See In Re: Audit of RBS Gas Utility's Deferred Gas Cost Account for the Period of March 2, 2001 Through February 28, 2002, Docket No. 02-00362 (Order Adopting ACA Audit Report of Tennessee Regulatory Authority's Energy and Water Division) p. 2 (September 24, 2002).

² Although the Company used an incorrect factor in calculating the ending balance in the ACA Account, Staff's customer bill audit revealed that the correct factor was charged to the customers. The error cited in this finding is only a reporting error.

³ Again, an audit of customer bills revealed only a reporting error.

The Staff issued its preliminary ACA audit findings to the Company on October 29, 2003. As of the November 24, 2003 Authority Conference, RBS had not responded to these findings. The Directors expressed concern about this lack of response from the Company and, for this reason, deferred consideration of the Staff's Report until the next Authority Conference scheduled for December 8, 2003. On November 26, 2003, the TRA's General Counsel sent a letter to Edward R. Ayres, president of RBS, seeking a response to the Report and the Company's participation at the December 8, 2003 Authority Conference.

Thereafter, RBS responded to the Staff's Report in a letter to the General Counsel dated December 3, 2003. In its response, RBS did not disagree with any of the Staff's audit findings⁴ but did indicate that it would continue exempting churches, schools, hospitals and government agencies from the monthly customer charge unless this practice is inconsistent with its tariff on file with the TRA.

The December 8, 2003 Authority Conference

Mr. Ed Ayres appeared in person at the December 8, 2003 Authority Conference. He apologized for his failure to expeditiously respond to the inquiries of Staff, explaining that this failure was due to his need for employment outside of the Company. He informed the Directors that an experienced individual had since been hired to handle the administrative needs of the Company, and he agreed to work with Staff to bring the Company into full compliance with TRA requirements. Based on these assurances and full consideration of Staff's Report, the Panel unanimously voted to approve the Report and adopt the findings and recommendations contained therein.

⁴ Mr. Ayers suggested that some of the errors resulted from the change in ownership approved by the TRA on October 21, 2003 in Docket No. 03-00428.

IT IS THEREFORE ORDERED THAT:

The Actual Cost Adjustment Audit Report, a copy of which is attached to this Order as Exhibit A, is approved and adopted and the findings and recommendations contained therein are incorporated in this Order as if fully rewritten herein.

Deborah Taylor Tate, Chairman

Pat Miller, Director

Sara Kyle, Director

PECENTY

2001 ON 13 PH 2:00

BEFORE THE TENNESSEE REGULATORY AUTHORITY T.R.A. DOCKET ROOM NASHVILLE, TENNESSEE

November 13, 2003

IN RE:)
RBS GAS UTILITY, INC. ACTUAL COST ADJUSTMENT (ACA) AUDIT) Docket No. 03-00389)
NOTICE OF FILING BY THE ENERGY AND	WATER DIVISION OF THE

NOTICE OF FILING BY THE ENERGY AND WATER DIVISION OF THE TENNESSEE REGULATORY AUTHORITY

Pursuant to Tenn. Code Ann. §§ 65-4-104, 65-4-111 and 65-3-108, the Energy and Water Division of the Tennessee Regulatory Authority (the "Energy and Water Division") hereby gives notice of its filing of the RBS Gas Utility, Inc., ACA Audit Report in this docket and would respectfully state as follows:

- 1. The present docket was opened by the Authority to hear matters arising out of the audit of RBS Gas Utility, Inc. (the "Company").
- 2. The Company's ACA filing was received on June 4, 2003 and the Staff completed its audit of same on October 28, 2003.
- 3. On October 29, 2003, the Energy and Water Division issued its preliminary ACA audit findings to the Company. The Company failed to respond to the audit findings.
- 4. The preliminary ACA audit report was modified to reflect the Company's non-response and a final ACA audit report (the "Report") resulted therefrom. The Report is attached hereto as Exhibit A and is fully incorporated herein by this reference. The Report

contains the audit findings of the Energy and Water Division, and the recommendations of the Energy and Water Division in connection therewith.

5. The Energy and Water Division hereby files its Report with the Tennessee Regulatory Authority for deposit as a public record and approval of the recommendations and findings contained therein.

Respectfully Submitted:

Pat Murphy

Energy and Water Division of the Tennessee Regulatory Authority

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November 2003 a true and exact copy of the foregoing has been either hand-delivered or delivered via U.S. Mail, postage pre-paid, to the following persons:

Deborah Taylor Tate, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243

Mr. Edward R. Ayers, President RBS Gas Utility, Inc. PO Box 1506 Madison, MS 39130

Henry Walker, Esq. Boult, Cummings, Conners & Berry P.O. Box 198062 Nashville, TN 37219

Pat Muspley
Pat Murphy

EXHIBIT A

RBS GAS UTILITY, INC.

COMPLIANCE AUDIT REPORT OF ACTUAL COST ADJUSTMENT

Docket #03-00389

PREPARED BY: TENNESSEE REGULATORY AUTHORITY ENERGY AND WATER DIVISION

NOVEMBER 2003

RBS GAS UTILITY, INC.

COMPLIANCE AUDIT REPORT OF ACTUAL COST ADJUSTMENT

DOCKET NO. 03-00389

TABLE OF CONTENTS

	, PAG	<u>GE NO</u> .
I.	INTRODUCTION	1
II.	AUDIT OPINION	1
III.	BACKGROUND INFORMATION ON COMPANY AND GAS SUPPLIERS	2.
IV.	JURISDICTION OF THE TENNESSEE REGULATORY AUTHORITY	2 [.]
V.	DESCRIPTION OF PURCHASED GAS ADJUSTMENT RULE	3
VI.	SCOPE OF ACTUAL COST ADJUSTMENT AUDIT	4
VII.	ACA AUDIT FINDINGS	5
VIII.	CONCLUSIONS AND RECOMMENDATIONS	12

I. INTRODUCTION

The subject of this audit is RBS Gas Utility, Inc.'s ("Company" or "RBS") compliance with the Actual Cost Adjustment and Refund Adjustment of the Purchased Gas Adjustment Rule ("PGA Rule") of the Tennessee Regulatory Authority ("TRA" or the "Authority"). The objective of the audit was to determine whether the Purchased Gas Adjustments, which are encompassed by the Actual Cost Adjustment ("ACA")¹, for the twelve (12) months ended February 28, 2003, were calculated correctly and were supported by appropriate source documentation.

II. AUDIT OPINION

On June 4, 2003, Staff received RBS's ACA filing supporting the activity in its deferred gas cost account ("ACA account") for the period March 1, 2002 through February 28, 2003. For the period under audit, this ACA filing showed \$148,084.51 in total gas costs, with \$142,958.18 being recovered from customers through rates. Adding a beginning balance in the ACA account of **negative** \$2,040.53 in over-collected gas costs from the preceding ACA period and interest due from customers for the current period of \$460.94 resulted in an ACA balance at February 28, 2003 of \$3,546.75 in under-recovered gas costs.² Small gas companies, such as RBS, do not automatically surcharge or refund the balance in the ACA account until the Staff's audit is complete and the surcharge or refund factor is approved by the TRA.³

Staff's audit resulted in six (6) findings.⁴ The net amount of these findings is a negative \$1,847.43 in over-recovered gas costs. Staff's correction of the Company's reported February 28, 2003 balance of \$3,546.75 produced an ending balance in the ACA account of \$1,699.31 in under-recovered gas costs.⁵ The amount of the Company's errors represents approximately 1.2 percent of its total gas invoices, and is therefore immaterial by comparison. Therefore, Staff concludes that except for the findings noted in this report, RBS is correctly implementing its Purchased Gas Adjustment Rider as calculated in the Actual Cost Adjustment, in accordance with the TRA rules for RBS Gas Utility.⁶

¹ The ACA is more fully described in Section V.

² A summary of the ACA account can be found in Section VII.

³ For Staff's recommendations regarding a surcharge factor and other recommendations, see Section VIII.

⁴ Refer to Section VII for a description of the findings.

⁵ Company's \$3,546.75 balance reduced by Staff findings of \$1,847.43.

⁶ Refer to Section VIII for Staff's recommendations for the Company's improvement in its ACA reporting.

III. BACKGROUND INFORMATION ON COMPANY AND GAS SUPPLIERS

Ownership of RBS Gas Utility was transferred from W.E. and Dianne Hathorn to Edward R. Ayers on December 26, 2002. The application for transfer was filed on July 2, 2003 and approved by the Authority on September 8, 2003.

RBS serves the city of Red Boiling Springs, Tennessee, which is located in Macon County. The Company's corporate office, however, is in Madison, Mississippi. As a gas distributor it has approximately 230 customers and an annual sales volume of approximately 26,000 MCF.

The natural gas used to serve this area is provided through long-term contracts with a nonaffiliated third party that transports gas via the TETCO pipeline to the city gate.

IV. JURISDICTION OF THE TENNESSEE REGULATORY AUTHORITY

Tennessee Code Annotated (T.C.A.) gave jurisdiction and control over public utilities to the Tennessee Regulatory Authority. T.C.A. §65-4-104 states that:

The [A]uthority has general supervisory and regulatory power, jurisdiction, and control over all public utilities, and also over their property, property rights, facilities, and franchises, so far as may be necessary for the purpose of carrying out the provisions of this chapter.

Further, T.C.A. §65-4-105 grants the same power to the Authority with reference to all public utilities within its jurisdiction as chapters 3 and 5 of Title 65 of the T.C.A. have conferred on the Department of Transportation's oversight of the railroads or the Department of Safety's oversight of transportation companies. By virtue of T.C.A. §65-3-108, this power includes the right to audit:

The department is given full power to examine the books and papers of the companies, and to examine, under oath, the officers, agents, and employees of the companies and any other persons, to procure the necessary information to intelligently and justly discharge its duties and carry out the provisions of this chapter and chapter 5 of this title.

The Energy and Water Division of the TRA is responsible for auditing those energy and water utilities under the Authority's jurisdiction to ensure that each company is abiding by Tennessee statute as well as the Rules and Regulations of the Authority. Pat Murphy of the Energy and Water Division conducted this audit.

V. <u>DESCRIPTION OF PURCHASED GAS ADJUSTMENT RULE</u>

The PGA Rule can be found in Chapter 1220-4-7 of the Rules of the Tennessee Regulatory Authority. The PGA Rule permits a gas company to recover, in a timely fashion, the total cost of gas purchased for delivery to its customers and to assure that a company does not over-collect or under-collect gas costs from its customers. The PGA consists of three major components:

- 1) The Actual Cost Adjustment (ACA)
- 2: The Gas Charge Adjustment (GCA)
- 3) The Refund Adjustment (RA)

The ACA is the difference between the revenues billed customers by means of the GCA and the cost of gas invoiced the Company by suppliers plus margin loss (if allowed by order of the TRA in another docket) as reflected in the Deferred Gas Cost account. The ACA then "trues-up" the difference between the actual gas costs and the gas costs recovered from customers through a surcharge or a refund. The RA refunds the "true-up" along with other supplier refunds. For a more complete definition of the GCA and RA, please see the PGA Formula in Appendix A to this report.

Section 1220-4-7-.03(2) of the PGA Rule requires:

Each year, the Company shall file with the [Authority] an annual report reflecting the transactions in the Deferred Gas Cost Account. Unless the [Authority] provides written notification to the Company within one hundred eighty (180) days from the date of filing the report, the Deferred Gas Cost Adjustment Account shall be deemed in compliance with the provisions of these Rules. This 180-day notification period may be extended by mutual consent of the Company and the [Authority] Staff or by order of the [Authority].

VI. SCOPE OF ACTUAL COST ADJUSTMENT AUDIT

The ACA audit is a limited compliance audit of RBS's ACA account. The audit goal was to verify that the Company's calculations of gas costs incurred and recovered were materially correct,⁷ and that the Company is following all Authority orders and directives with respect to its calculation of the ACA account balance. Refer to the ACA Account detail provided in Section VII, <u>Summary of ACA Account.</u>

To accomplish the audit goal, Staff reviewed gas supply invoices, as well as supplemental schedules and other source documentation provided by the Company. Where appropriate, Staff requested additional information to clarify the filing. Staff also audited a sample of customer bills to determine if the proper tariff rates, as well as PGA and ACA rates were applied in the Company's calculation of customer bills during the twelve month audit period. After recalculating each sample bill, Staff determined that the Company's calculation methods are correct.

⁷ The audit goal is not to guarantee that the Company's results are 100% correct. Where it is appropriate, Staff utilizes sampling techniques to determine whether the Company's calculations are materially correct. Material discrepancies would dictate a broadening of the scope of Staff's review.

VII. ACA AUDIT FINDINGS

The result of the Staff's audit was a **net over-recovery of \$1,847.43**, which had the net effect of <u>decreasing the Company's under-recovery balance in the ACA account</u> by this amount. A summary of the account as filed by the Company and as adjusted by the Staff is shown below, followed by a detail of each finding.

SUMMARY OF THE ACA ACCOUNT:8

Line No.		Company (as filed)	Staff (as corrected)	Difference (Findings)
1	Beginning Balance at 03/01/02	\$ -2,040.53	\$ -3,890.45	\$-1,849.92
2	Activity During Current Period:			
3 4 5 6	Plus Gas Costs Minus Recoveries inc. in Base Rates Minus ACA Recoveries Minus PGA Recoveries Ending Balance before Interest (line 1 + line 3 – line 4 – line 5 – line 6)	\$148,084.51 82,243.41 -1,120.42 61,835.19 \$ 3,085.80	\$142,695.58 82,243.41 -7,365.71 62,376.02 \$ 1,551.41	\$-5,388.93 0.00 -6,245.29
8	Plus Interest	460.94	<u>147.90</u>	313.04
9	Ending Balance Including Interest at 02/28/03 (line 7 + line 8)	<u>\$ 3,546.75</u>	<u>\$ 1,699.31</u>	<u>\$-1,847.43</u>

SUMMARY OF FINDINGS:

FINDING #1	Customer Charge		No effect
FINDING #2	Beginning Balance	\$-1,849.92	Over-recovery
FINDING #3	Invoiced Gas Costs	-5,388.93	Over-recovery
FINDING #4	ACA Recoveries	6,245.29	Under-recovery
FINDING #5	PGA Recoveries	-540.83	Over-recovery
FINDING #6	Interest Calculation	313.04	Over-recovery
	Net Results	<u>\$-1,847.43</u>	Over-recovery

⁸ A negative number represents an over-recovery (or over-collection) of gas costs.

FINDING #1:

Exception

The Company did not bill the monthly customer charge to some customers.

Discussion

During an audit of customer bills, Staff discovered that, of the sample reviewed, the Company failed to bill the monthly customer charge of \$5.00 to four (4) customers. These four (4) were comprised of a church, a school, a government agency and a hospital. The Company's tariff does not make these exceptions. This error did not affect the balance in the ACA Account.

Company Response

The Company failed to respond to the Staff's finding.⁹

⁹ Staff forwarded its draft findings to the owner of RBS and made multiple attempts to contact him prior to the issuance of this report. Staff received no response.

FINDING #2:

Exception

The Company used an incorrect Beginning Balance to calculate the balance in the ACA Account as of February 28, 2003.

Discussion

In the audit report for the period covering the 12-months ending February 28, 2002, Staff stated that the correct ending balance for the audit period was negative \$3,890.45. The Company used negative \$2,040.53, which was the ending balance before adding the interest due to customers of negative \$1,849.92. This error resulted in a \$1,849.92 over-recovery in the ACA Account.

Company Response

¹⁰ TRA Docket No. 02-00362, page 7 of Staff's audit report.

FINDING #3:

Exception

The Company reported incorrect gas costs for the month of March 2002.

Discussion

The Woodward Marketing invoice for gas purchases for March 2002 was \$18,522.00. While the Company showed this amount on its spreadsheet, Staff determined that the Company actually used \$23,910.93 in its calculation of a \$3,085.80 balance, before interest, and in its calculation of \$460.94 in interest, for a net balance at February 28, 2003 of \$3,546.75. Using the correct invoice amount for March 2002 results in a \$5,388.93 over-recovery in the ACA Account.

Company Response

FINDING #4:

Exception

The Company used an incorrect ACA factor to calculate the ending balance in the ACA Account at February 28, 2003.

Discussion

For the months of August 2002 through February 2003, the Company used a positive \$0.1565 factor (surcharge) to calculate the ACA recoveries each month. The correct ACA factor calculated in Docket No. 02-00362 was a negative \$0.1565 (refund). Correcting this error resulted in a **\$6,245.29 under-recovery** in the ACA Account.

While the Company used an incorrect factor in calculating the ending balance in the ACA Account, Staff's customer bill audit revealed that the <u>correct</u> factor was actually charged to the customers. The error cited in this finding is a reporting error.

Company Response

FINDING #5:

Exception

The Company used an incorrect PGA factor to calculate the ending balance in the ACA Account at February 28, 2003.

Discussion

For the months of March 2002 through June 2002, the Company used a positive \$2.6095 factor (surcharge) to calculate the PGA recoveries each month. The correct PGA factor calculated in Tariff Filing No. 01-00584 was a positive \$2.71230. Correcting this error resulted in a \$540.83 over-recovery in the ACA Account.

While the Company used an incorrect factor in calculating the ending balance in the ACA Account, Staff's customer bill audit revealed that the <u>correct</u> factor was actually charged to the customers. The error cited in this finding is a <u>reporting error</u>.

Company Response

FINDING #6:

Exception

The Company calculated the wrong interest amount.

Discussion

Two errors contributed to the \$313.04 over-recovery of interest from customers. The Company used incorrect interest rates in its calculations for the first and second quarter of 2002 and the first quarter of 2003. The following compares the rates used by the Company compared to the correct rates. The PGA Rule describes the correct method for calculating interest on account balance for the deferred gas account (ACA Account). The TRA Staff calculates this rate quarterly and notifies all companies under its jurisdiction of the correct rates to use. There is no reason for a Company to deviate from these rates. The error resulted in a \$2.37 under-recovery in the ACA Account.

Quarter	Rate Used by Company	Rate Prescribed by TRA
1 st Q 2002	4.75%	5.64%
2 nd Q 2002	4.75%	4.78%
1 st Q 2003	4.65%	4.62%

The second error resulted from the other findings noted. Staff recalculated the interest after correcting all findings. The difference was a \$315.41 over-recovery in the ACA Account.

Company Response

VIII. CONCLUSIONS AND RECOMMENDATIONS

The corrected balance in the ACA account as of February 28, 2003 is \$1,699.31 in under-recovered (under-collected) gas costs. Staff's calculation of this balance is shown in the Summary of the ACA Account in Section VII. This balance is the sum of \$5,441.86 in under-collected gas costs for the period, \$147.90 in interest due from customers, and -\$3,890.45 in the over-collected beginning balance at March 1, 2002. Spreading the \$1,699.31 balance over the 12 month-to-date February 2003 sales of 25,621 MCF produces an ACA adjustment factor of \$0.0663 (surcharge) per MCF. Therefore, RBS's new billing rate is \$9.9291 per MCF for residential and commercial customers. It is composed of \$7.50 base rate plus the currently approved \$2.3628 purchased gas adjustment plus the new \$0.0663 ACA adjustment. For Industrial customers, the new billing rate is \$8.9291 (\$6.50 + \$2.3628 + \$0.0663). The new rates should be implemented with the Company's November 2003 billing.

Most of the Company's errors were made in calculating the correct balance in the ACA account as of February 28, 2003. Since the Staff's audit of customer bills revealed that customers were being billed appropriately, the errors have not affected the PGA process. The Company does not surcharge or refund ACA account balances until they have been audited by TRA Staff; therefore, no errors in billing occurred.

Staff would strongly recommend that the new owner of RBS meet with Staff at a mutually convenient time and receive instruction on proper procedures for calculation and presentation of the ACA account balance before the next filing is due, in order to minimize the types of errors discovered in this filing.

APPENDIX A

PGA FORMULA

The computation of the GCA can be broken down into the following formulas:

$$Non-Firm GCA = \begin{array}{c} P + T + SR CACA \\ \hline ST \end{array}$$

where

GCA = The Gas Charge Adjustment in dollars per Ccf/Therm, rounded to no more than five decimal places.

D = The sum of all fixed Gas Costs.

DACA = The demand portion of the ACA.

P = The sum of all commodity/gas charges.

T = The sum of all transportation charges.

SR = The sum of all FERC approved surcharges.

CACA = The commodity portion of the ACA.

DB = The per unit rate of demand costs or other fixed charges included in base rates in the most recently completed general rate case (which may be zero if the Company so elects and the Commission so approves).

CB = The per unit rate of variable gas costs included in base rates in the most recently completed general rate case (which may be zero if the Company so elects and the Commission so approves).

SF = Firm Sales.

ST = Total Sales.

The computation of the RA can be computed using the following formulas:

Firm RA =
$$\frac{DR1 - DR2}{SFR}$$
 $\frac{CR1 - CR2 + CR3 + i}{STR}$

Non-Firm RA = $\frac{CR1 - CR2 + CR3 + i}{STR}$

where

RA =	The Refund Adjustment in dollars per Ccf/Therm, rounded to no more than five decimal places.
DR1 =	Demand refund not included in a currently effective Refund Adjustment, and received from suppliers by check, wire transfer, or credit memo.
DR2 =	A demand surcharge from a supplier not includable in the GCA, and not included in a currently effective Refund Adjustment.
CR1 =	Commodity refund not included in a currently effective Refund Adjustment, and received from suppliers by check, wire transfer, or credit memo.
CR2 =	A commodity surcharge from a supplier not includable in the GCA, and not included in a currently effective Refund Adjustment.
CR3 =	The residual balance of an expired Refund Adjustment.

- i = Interest on the "Refund Due Customers" account, using the average monthly balances based on the beginning and ending monthly balances. The interest rates for each calendar quarter used to compute such interest shall be the arithmetic mean (to the nearest one-hundredth of one percent) of the prime rate value published in the "Federal Reserve Bulletin" or in the Federal Reserve's "Selected Interest Rates" for the 4th, 3rd, and 2nd months preceding the 1st month of the calendar quarter.
- SFR = Firm sales as defined in the GCA computation, less sales under a transportation or negotiated rate schedule.
- STR = Total sales as defined in the GCA computation, less sales under a transportation or negotiated rate schedule.