BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

August 4, 2010

IN RE:	)
	)
PIEDMONT NATURAL GAS COMPANY	**) Docket No. 09-00093**
ACTUAL COST ADJUSTMENT (ACA) AUDIT	)

NOTICE OF REVISED FILING BY THE UTILITIES DIVISION OF THE TENNESSEE REGULATORY AUTHORITY

Pursuant to Tenn. Code Ann. §§ 65-4-104, 65-4-111 and 65-3-108, the Utilities Division of the Tennessee Regulatory Authority hereby gives notice of its filing of the Revised Compliance Audit Report of the Actual Cost Adjustment (hereafter "ACA") Component of the Purchased Gas Adjustment Rule ("PGA Rule") for Piedmont Natural Gas Company (hereafter the "Company") 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 the Company's ACA filing for the period January 2008 through December 2008.

2. The Company originally filed its ACA for audit on July 1, 2009. Audit Staff (hereafter the "Staff") completed its audit of same on March 11, 2010 and issued its original Audit Report on April 1, 2010.

3. On July 21, 2010, the Company withdrew the original filing and filed its Revised Actual Cost Adjustment Account for the twelve months ended December 31, 2008.

4. On July 29, 2010, the Staff issued its preliminary revised audit findings to the Company via e-mail. The Company responded on July 30, 2010 via e-mail and this response has been incorporated into the final report. The Revised Report is attached hereto as Exhibit A and is fully incorporated herein by this reference.

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

Respectfully Submitted:

Michelle Ramsey

Michelle Ramsey
Utilities Division
Tennessee Regulatory Authority

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, 2010, 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:

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EXHIBIT A

COMPLIANCE AUDIT REPORT

OF

Piedmont Natural Gas Company

ACTUAL COST ADJUSTMENT

DOCKET NO. 09-00093

PREPARED BY

TENNESSEE REGULATORY AUTHORITY

UTILITIES DIVISION

August 2010

COMPLIANCE AUDIT

PIEDMONT NATURAL GAS COMPANY

ACTUAL COST ADJUSTMENT

DOCKET NO. 09-00093

TABLE OF CONTENTS

I. INTRODUCTION

The subject of this audit is Piedmont Natural Gas Company's ("Piedmont" "Company" or "PNG") 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 ("PGA"), which are encompassed by the Actual Cost Adjustment ("ACA")[1], for the twelve (12) months ended December 31, 2008, were calculated correctly and were supported by appropriate source documentation.

II. AUDIT OPINION

On July 21, 2010, the TRA Audit Staff (hereafter "Staff") received PNG's ACA filing supporting the activity in its deferred gas cost account ("ACA Account") for the period January 1, 2008 through December 31, 2008. Staff's audit resulted in six (6) findings.[2] The net amount of these findings is **$120,313.52 in over-recovered gas costs**. The Company's reported December 31, 2008 balance of **$19,626,804.25 in over-recovered** gas costs is increased by the $120,313.52 over-collected gas costs determined in this audit. The corrected balance in the ACA Account at December 31, 2008 is **$19,747,117.77 in over-recovered gas costs.** The amount of the Company's errors represent less than one percent of its total gas invoices, and is therefore immaterial by comparison. Staff concludes that except for the findings noted in this report, PNG is correctly implementing its Purchased Gas Adjustment Rider as calculated in the Actual Cost Adjustment, in accordance with TRA rules for Piedmont Natural Gas Company.

III. BACKGROUND INFORMATION ON COMPANY AND GAS SUPPLIERS

Piedmont Natural Gas Company (local distribution company), with headquarters at 665 Mainstream Drive, Nashville, Tennessee, is an operating division of Piedmont Natural Gas Company (parent company), which has its headquarters at 4720 Piedmont Row Drive, Charlotte, North Carolina. On February 12, 2008, the Company notified the Authority of its intent to change the name under which it operates in Tennessee from Nashville Gas Company to its corporate name of Piedmont Natural Gas Company, Inc. The Authority issued an order on March 31, 2008 in Docket No. 08-00028 approving the change. Piedmont is a gas distributor that provides service to several communities in the Middle Tennessee area. The natural gas used to serve these areas is purchased from producers and marketers and transported to Piedmont's city gate through the interstate transmission facilities of Tennessee Gas Pipeline ("TGP"), Columbia Gas Transmission Corporation ("CGTC"), Texas Eastern Gas Pipeline ("TETCO") and Midwestern Gas Transmission Company ("MGT").

[1] The ACA is more fully described in Section V.

[2] Refer to Section VII for a description of the findings.

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 Utilities Division Staff of the TRA is responsible for auditing those energy, water and wastewater 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. Michelle Ramsey and Pat Murphy conducted this audit.

V. DESCRIPTION OF PURCHASED GAS ADJUSTMENT RULE

Actual Cost Adjustment Audits:

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.

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].

Prudence Audit of Gas Purchases:

Section 1220-4-7-.05 of the PGA Rule requires, unless otherwise ordered by the Authority, an "Audit of Prudence of Gas Purchases" by a qualified consultant. This specialized audit evaluates and reports annually on the prudence of any gas costs included in the PGA. In Docket 96-00805, Nashville Gas was authorized to operate under a Performance-Based Ratemaking Mechanism ("PBR" or "Incentive Plan"), beginning July 1, 1998, and continuing each year unless terminated by the Company or the Authority. For each year that the mechanism was in effect, the requirements of Section 1220-4-7-.05 of the PGA Rule was waived. On December 14, 2007, the TRA issued an order in Docket 05-00165 approving a revised Incentive Plan for Nashville Gas, effective July 1, 2006. This revised Incentive Plan replaces the annual prudence review of the Company's gas purchasing activities.

VI. SCOPE OF ACTUAL COST ADJUSTMENT AUDIT

The ACA audit is a limited compliance audit of PNG's ACA Account. The audit goal is to verify that the Company's calculations of gas costs incurred and recovered are materially correct,[3] and that the Company is following all Authority orders and directives with respect to its calculation of the ACA Account balance. On November 26, 2008 the Company filed a PGA to change the ACA factor to begin refunding the unaudited balance in the ACA Account at October 31, 2008, effective January 1, 2009. On January 29, 2009, Piedmont filed a PGA to update its ACA factor to reflect the unaudited balance in the ACA Account at November 30, 2008, effective March 1, 2009.[4]

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[3] 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.

[4] Due to the reorganization that took place at the Company and the contested issues in the audit covering the calendar year 2006 (Docket No. 07-00174), the annual filings of the Company have been temporarily disrupted.

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.

The filing for calendar year 2007 was not filed until December 18, 2008 and the current filing for calendar year 2008 was not filed until July 1, 2009. The Company hopes to file its ACA for the calendar year 2009 by the end of June 2010, and to file its calendar year 2010 ACA close to on schedule next year, depending on the date the current audit is finalized. Two PGA filings were made that covered portions of the current audit period. Usually, companies file to surcharge or refund the balance in the ACA Account within a couple months following the close of an audit period. However, PNG's filing schedule to implement its new ACA factors has been temporarily disrupted as well.

VII. ACA AUDIT FINDINGS

The result of the Staff's audit was a **net over-recovery of $120,313.52** which has the effect of increasing the Company's over-recovered balance at December 31, 2008 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 detailed description of each finding.

SUMMARY OF THE ACA ACCOUNT:

	Company	Staff	Difference (Findings)
Commodity Balance at 1/1/08	($ 3,044,019.59)	($ 3,044,019.59)	$ 0.00
Plus Gas Costs	202,317,858.30	201,811,470.39	($506,387.91)
Minus Recoveries	218,300,103.56	217,897,349.53	(402,754.03)
Ending Balance before Interest	($19,026,264.85)	($19,129,898.73)	($ 103,633.88)
Plus Interest	($ 683,413.79)	($ 690,584.82)	($ 7,171.02)
Commodity Balance at 12/31/08	($19,709,678.64)	($19,820,483.55)	($ 110,804.90)
Demand Balance at 1/1/08	$ 2,172,784.29	$ 2,172,784.29	$ 0.00
Plus Gas Costs	7,255,394.61	7,255,394.61	0.00
Minus Recoveries	9,385,825.17	9,394,995.77	9,170.60
Ending Balance before Interest	$ 42,353.73	$ 33,183.13	($ 9,170.60)
Plus Interest	$ 40,520.66	$ 40,182.65	($ 338.02)
Demand Balance at 12/31/08	$ 82,874.39	$ 73,365.78	($ 9,508.62)
Total ACA Ending Balance at 12/31/08	($19,626,804.25)	($19,747,117.77)	($ 120,313.52)

Note: A negative number indicates an over-recovery of gas costs.

SUMMARY OF FINDINGS:

COMMODITY:

				See page
FINDING #1	Commodity gas cost	$ (5,131.12)	Over-recovery	6
FINDING #2	Storage Costs	(501,256.79)	Over-recovery	7
FINDING #3	Commodity Recoveries	402,754.03	Under-recovery	8
FINDING #4	Interest – Commodity	(7,171.02)	Over-recovery	9
FINDING #5	Demand Recoveries	(9,170.60)	Over-recovery	10
FINDING #6	Interest – Demand	(338.02)	Over-recovery	11
	Net Result	**$ (120,313.52)**	**Over-recovery**	

FINDING #1:

Exception

The Company overstated its Commodity gas cost.

Discussion

In January 2008, the Company included $5,131.12 of Overrun Storage Charges in both Commodity gas costs and Storage charges. This amount should have only been included in the Storage charges, resulting in a duplication of the booked cost. The result of this finding is a **decrease in** Commodity gas costs **of $5,131.12(Over-recovery).**

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $5,131.12 and will adjust its records accordingly.

FINDING #2:

Exception

The Company overstated its Storage Costs.

Discussion

The Company filed separate schedules for Storage accounts FSMA, FSPA, FSSNASH and LNG to report Storage Inventory activities. In October 2008, the Company made withdrawal adjustments to each of the inventory schedules in order to true up the storage balances. The result of these adjustments was a decrease in Storage costs of $354,371.67 for FSMA Storage, a decrease in Storage cost of $19,133.50 for FSSNASH Storage and an increase in Storage costs of $2,065.76 for FSPA Storage. These amounts, however, were not booked to the ACA account. Additionally, a negative $4,821.99 adjustment for LNG Storage was removed from the inventory schedule, after the Company indicated it was inappropriate.

Since these were prior period adjustments, the adjustments should have been made at the beginning of the audit period which was in January 2008 to accurately reflect the amount of interest on the ACA Account. Staff moved these adjustments to January 2008 on the inventory schedules, and recalculated the cost of inventory activities for all 12 months of the audit period based on the new withdrawal rates. Staff then included adjusting withdrawal charges of negative $360,171.87 for FSMA Storage, negative $140,068.07 for FSSNASH Storage and negative $704.19 for FSPA Storage in the ACA Account in January 2008.

One additional adjustment to the ACA was required due to the removal by the Company of the adjustment in the LNG Storage schedule. Removal of the adjustment caused a change in the withdrawal rates going forward, resulting in a Staff adjustment to the withdrawal charges of negative $43.98 in October 2008, a negative $70.84 in November 2008 and a negative $197.84 in December 2008 in the ACA Account.

The result of the above adjustments was a decrease in Commodity gas costs of **$501,256.79.** This represents an **over-recovery of gas costs**.

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $501,256.79 and will adjust its records accordingly.

FINDING #3:

Exception

The Company overstated its Commodity gas cost recoveries.

Discussion

The Commodity ACA recoveries are calculated by multiplying the sales volumes by the applicable Commodity ACA surcharge/(refund) rate. Using the schedules in the format provided by the Company to document the ACA recoveries, Staff could not verify that the Company's calculation of the $4,439,584.88 reported as the amount of Commodity ACA surcharges for audit period were accurate. At the request of Staff, the Company provided additional information which showed total Commodity ACA surcharges of $4,036,830.85 for the audit period. The result is that the Company reported **$402,754.03** more in Commodity ACA surcharges than it actually received. The effect is an **Under-recovery of** Commodity gas costs.

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $402,754.03 and will adjust its records accordingly.

FINDING #4:

Exception

The Company understated the amount of interest due to customers in the Commodity component of the ACA filing.

Discussion

Staff adjusted the Company reported Commodity ACA interest due from adjustments #1 - #3 above. The result of this finding is an **increase to reported interest due to customers of $7,171.02(Over-recovery).**

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $7,171.02 and will adjust its records accordingly.

FINDING #5:

Exception

The Company understated its Demand gas cost recoveries.

Discussion

The Demand gas cost recoveries for "Sale for Resale" customers is calculated by multiplying the demand determinants of tariff rate 310 by the Demand PGA rate. During all 12 months of the audit period, the Company used incorrect demand determinants of tariff rate 310. The result of this error is an increase of **$6,572.47** in the Demand gas cost recoveries **(Over-recovery).**

The Demand ACA Surcharge for "Sale for Resale" customers is calculated by multiplying the demand determinants of tariff rate 310 by the Demand ACA Surcharge rate. In the same way as Demand gas cost recoveries, the company used incorrect demand determinants of tariff rate 310 for the audit period. The result of this error is an increase of **$2,598.13** in the Demand gas cost recoveries **(Over-recovery).**

The net effect (excluding interest) of Staff's adjustments is an increase in the Company reported Commodity gas cost recoveries of **$9,170.60(Over-recovery).**

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $9,170.60 and will adjust its records accordingly.

FINDING #6:

Exception

The Company understated the amount of interest due to customers in the Demand component of the ACA filing.

Discussion

Staff recalculated interest based upon the audit finding #6 above. Demand interest due to the customers was **understated by $338.02(Over-recovery)**. Staff made the adjustment to the ACA Account to reflect this amount.

Company Response

The Company is in agreement with the above Audit Staff findings in the amount of $338.02 and will adjust its records accordingly.

VIII. CONCLUSIONS AND RECOMMENDATIONS

Background

Piedmont initially filed its ACA Account for the 12-months ended December 31, 2008 on July 1, 2009 in Docket 09-00093. Audit Staff subsequently filed its initial compliance Audit Report on April 1, 2010. The Report contained seven (7) audit findings totaling a net $5,362,912.86 in over-recovered gas costs. The magnitude of the result stemmed primarily from Finding #2 and its related interest finding. The substance of Finding #2 was the methodology used by the Company for including its hedging costs in the ACA Account for recovery from ratepayers. The Company booked total costs related to hedging transactions that were paid in 2008 (including net gains and losses experienced), without regard to the periods benefited (or protected) from the original hedges. In addition, the Company failed to apply the one percent (1%) recovery cap to the total costs as required in its tariff.

Piedmont disputed Audit Staff's finding. In its response to Finding #2, the Company explained its position as to the accounting for hedging transactions. The Company also set forth its interpretation of the tariff as to the calculation of the one percent (1%) recovery cap. Since Audit Staff and Piedmont disagreed on the methodology for calculating the cap[5], the Company filed its *Request for Declaratory Interpretation* of Piedmont's Service Schedule No. 316, Performance Incentive Plan, as it relates to the recovery of hedging costs, on April 6, 2010.

Following several rounds of discovery from the TRA Advisory Staff to Piedmont and Audit Staff, the Consumer Advocate filed a petition to intervene on May 7, 2010. On June 22, 2010, the Hearing Officer issued an order further extending the audit period to August 31, 2010.

Audit Staff entered into discussions with Piedmont and the Consumer Advocate in an attempt to resolve the differences between Audit Staff and the Company as they related to Finding #2 in the Audit Report. All parties agreed that it was important to finalize the current audit and the appropriate ending balance in the ACA Account at December 31, 2008, in order to avoid further delay in filing the 2009 ACA filing. A joint review of the costs incurred in 2008 has led to an agreement of the parties as to the proper allocation of hedging costs to the period covered by the underlying hedges. Using this methodology, the appropriate amount of hedging costs allocated to the 2008 audit period is $3,256,194, which includes $2,183,658 in losses which are recovered at 100% and $1,072,536 in hedging costs that are subject to the one percent (1%) cap.

Ultimately, the parties agreed that Piedmont would withdraw its original ACA filing and re-file it using the agreed upon costs that should be allocated to the 2008 audit period.

Revised Audit Report

Piedmont filed a letter with the Authority on July 21, 2010 withdrawing its original filing made on July 1, 2009. It enclosed the Revised Actual Cost Adjustment Account for the 12-months

[5] Audit Staff applied a strict interpretation of the tariff to mean the annual gas costs incurred in the current audit period.

ended December 31, 2008 which is the subject of Audit Staff's Revised Audit Report. On July 28, 2010, Audit Staff and the Consumer Advocate met with Company representatives to review the revised filing of hedging costs. The Company was able to satisfactorily document the allocated costs. Since the total allocated costs for 2008, $1,072,536, did not exceed either Audit Staff's calculation of the cap or the Company's calculation of the cap, that issue did not impact the resolution of the audit, and it was unnecessary for the parties to reach consensus. That issue will need to be addressed in the declaratory ruling.

Finding #2 in the original Audit Report has been eliminated from the Revised Audit Report. The new Finding #4 which is the amount of interest associated with the Commodity findings has now changed from an over-recovery of $79,616.71 to an over-recovery of $7,171.02, with which the Company concurs. The remaining findings are the same as those included in the original Audit Report. The revised balance in the ACA Account is a negative $19,747,117.77 in over-recovered gas costs.[6] This balance will become the beginning balance at January 1, 2009 in the Company's next ACA filing, thereby correcting all errors noted in this report. **Staff requests the Authority's approval of the Company's adjusted ACA Account balance as stated in this report.**

Recommendations

1. Currently the ACA audit cycle follows a calendar year, from January through December and the IPA[7] audit period is on a July through June audit cycle. Due to the intimate relationship of the two audits, the mismatch in audit cycles presents a problem to Audit Staff. Information needed to audit the ACA Account balance may not be readily available for certain months and a similar issue is encountered in the audit of the IPA Account balance. Should the Authority agree with the Company's proposed interpretation of its Performance Incentive Plan as it relates to the calculation of the one percent of annual gas costs cap,[8] it will be even more important for the audit cycles of the two audits to match up. Audit Staff discussed this with the Company and the Consumer Advocate and all are in agreement that it would be desirable to transition the audit of the ACA Account to a July through June audit cycle. This would entail looking at an 18-month period for the ACA Account on a one-time basis in the next audit. Therefore, Audit Staff requests the Authority to approve this one time transition audit.
2. Since the parties did not reach a consensus on the interpretation of the Performance Incentive Plan as it relates to the calculation of the one percent annual gas cost cap, that issue remains for the Authority to address in the Company's *Request for Declaratory Interpretation.* For the sake of clarity and in order for the 2008 audit year to be closed, Audit Staff recommends the *Request for Declaratory Interpretation* be moved to a separate docket.
3. It is Audit Staff's understanding that Piedmont is ready to file its next ACA filing, pending resolution of the current audit (and establishment of the ending balance in the ACA Account) and the decision in the *Request for Declaratory Interpretation.* With the

[6] Section VII, SUMMARY OF THE ACA ACCOUNT, page 5.
[7] Incentive Plan Account audit.
[8] *Request for Declaratory Interpretation*, paragraphs 4 and 5 (April 6, 2010).

Authority's approval, the audit will cover an 18-month period. Audit Staff respectfully urges the Authority to approve Audit Staff's Audit Report and address the issue of the declaratory interpretation as quickly as possible to avoid further delay in the Company's filing.

APPENDIX A

PGA FORMULA[9]

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

$$\text{Firm GCA} = \frac{D + DACA}{SF} - DB + \frac{P + T + SR + CACA}{ST} - CB$$

$$\text{Non-Firm GCA} = \frac{P + T + SR \;\; CACA}{ST} - CB$$

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.

[9] Pursuant to Docket 03-00209, the PGA Formula has been amended to include the gas cost portion of uncollectible accounts.

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

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

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

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.