

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)
On Its Own Motion)
)
vs.) Docket 09-0544
)
Northern Illinois Gas Company)
d/b/a Nicor Gas Company)
)
Reconciliation of revenues collected under)
gas adjustment charges with actual costs)
prudently incurred.)

Direct Testimony of

BOB O. BUCKLES

Manager of Rate Research and Administration

Northern Illinois Gas Company
d/b/a Nicor Gas Company

April 13, 2010

1 **I. INTRODUCTION**

2 **Q. Please state your name.**

3 A. Bob O. Buckles.

4 **Q. By whom are you employed and what is the business address?**

5 A. Northern Illinois Gas Company d/b/a Nicor Gas Company (“Nicor Gas” or “Company”)
6 located at 1844 Ferry Road, Naperville, Illinois 60563.

7 **Q. What position do you hold with Nicor Gas?**

8 A. I am the Manager of Rate Research and Administration.

9 **Q. Please summarize your educational background and your experience in the public**
10 **utility business.**

11 A. I hold the degree of Bachelor of Science, majoring in Energy Resource Management
12 from Eastern Illinois University. I have been employed by Nicor Gas since 1989. From
13 1989 until 2003, I held positions in Commercial and Industrial Sales, Energy
14 Management Services, Rates, Asset Planning and Development and Gas Supply
15 Operations. I assumed my present responsibilities in the Rate Department in October,
16 2003.

17 **Q. Would you please describe your present job responsibilities?**

18 A. Yes. My present job responsibilities are primarily preparing and filing documents with
19 the Illinois Commerce Commission (the “Commission”) and reviewing Company
20 activities as they pertain to compliance with Company tariffs and the Illinois

21 Administrative Code. In addition, I have responsibility over various research and
22 analytical requirements within the Rate Department.

23 **Q. Have you ever testified before the Illinois Commerce Commission?**

24 A. Yes, I have filed testimony for Nicor Gas in previous PGA reconciliation dockets, more
25 specifically, Docket Nos. 03-0703, 04-0681, 05-0747, 06-0750, 07-0575 and 08-0630.

26 **II. SUMMARY OF TESTIMONY**

27 **Q. What is the purpose of your testimony in this proceeding?**

28 A. The purpose of my testimony in this case is to explain Nicor Gas' reconciliation of
29 Rider 6 Gas Supply Cost ("GSC") revenues collected to recover its actual cost of gas
30 distributed, to the extent that such costs are recoverable, as recorded on the books of the
31 Company for the 12 months ended December 31, 2009. My testimony and exhibits are in
32 response to the Commission's Order Commencing Reconciliation Proceedings entered
33 November 12, 2009, in Docket No. 09-0544.

34 **Q. Is any further purpose served by your testimony?**

35 A. No.

36 **Q. Was notice given to the public relative to the filing of the testimony and exhibits in
37 this docket?**

38 A. Yes. Pursuant to the requirements set forth in the Commission's Order, and in
39 accordance with the requirements of 83 Illinois Administrative Code Part 255, Nicor Gas
40 has posted a printed "Public Notice" card with respect to this case in the business offices
41 of the Company, and a similar public notice was published in newspapers of general
42 circulation in Nicor Gas' service territory. A copy of the printed card and verifiable

43 support of publication will be presented during the hearings in this proceeding. In
44 addition, copies of Nicor Gas' testimony and exhibits are on file and available for public
45 inspection in each of the Company's business offices.

46 **III. DESCRIPTION OF RIDER 6, GAS SUPPLY COST ("GSC")**

47 **Q. Please generally describe Nicor Gas' Rider 6, Gas Supply Cost.**

48 A. Rider 6 prescribes the method of computing Nicor Gas' end-user GSC charges, or rates,
49 for the recovery of the Company's Cost of Gas Distributed. In particular, the GSC
50 charges developed under Rider 6 are designed to recover the costs the Company incurs
51 for quantities of gas the Company purchases, transports, stores and sells for the purpose
52 of serving its end-user customers. The purpose and intent of Rider 6 is to promptly pass
53 along to customers, through the GSC charges developed under the Rider, Nicor Gas' net
54 gas supply cost, without markup or profit.

55 **Q. Does Rider 6 comply with the 83 Illinois Administrative Code Section 525**
56 **Purchased Gas Adjustment Clause requirements?**

57 A. Yes. The Commission approved the Company's Rider 6 as compliant with the
58 Commission's Purchased Gas Adjustment Clause requirements on October 3, 1995 in
59 Docket No. 94-0403. Additionally, the Commission in Docket No. 04-0779 ordered
60 Nicor Gas to make certain changes to Rider 6.

61 **Q. Please describe in more detail the gas costs that are recoverable through Rider 6.**

62 A. Recoverable gas costs are derived in accordance with Part 525.40 of the 83 Illinois
63 Administrative Code and are specifically identified in Section D of Sheets 59 and 60 of
64 the Company's filed tariffs (Ill. C.C. No. 16 – Gas). In general, the costs incurred by the

65 Company and recovered through Rider 6 are: (1) gas costs based on volumes of gas
66 purchased from suppliers, generally referred to as commodity gas costs; and (2) gas costs
67 other than those defined as commodity related, generally referred to as non-commodity
68 gas costs. Non-commodity gas costs include costs incurred from interstate pipeline
69 companies for transportation and storage.

70 **Q. Please describe the charges used to recover Nicor Gas' costs through Rider 6.**

71 A. Attached to my testimony as Exhibit BOB-2.1 is a list of the primary Rider 6 charges
72 along with corresponding descriptions of what type of costs each charge recovers and the
73 customer classes to which each charge is assessed. As seen in Exhibit BOB-2.1, six gas
74 charge components are employed under Rider 6: the Commodity Gas Cost ("CGC")
75 charge, the Non-Commodity Gas Cost ("NCGC") charge, the Demand Gas Cost
76 ("DGC") charge, the Gas Cost ("GC") charge, the Customer Select Balancing Charge
77 ("CSBC") and the Transportation Service Adjustment ("TSA").

78 **Q. Please describe the Commodity Gas Cost (CGC) charge.**

79 A. The CGC charge reflects Nicor Gas' incurred commodity costs. It is applied to all therms
80 of Company-supplied gas.

81 **Q. Please describe the Non-Commodity Gas Cost (NCGC) charge.**

82 A. The NCGC charge recovers the Company's non-commodity costs on a cent per therm
83 used basis.

84 **Q. What does the Demand Gas Cost (DGC) charge recover?**

85 A. Like the NCGC charge, the DGC charge recovers non-commodity gas costs but on a
86 Maximum Daily Contract Quantity ("MDCQ") basis. The MDCQ is the maximum

87 amount of gas used by a customer in one (1) day. The DGC charge is applicable as a
88 back-up charge to customers on Nicor Gas' system that have elected to transport their
89 own gas supplies, but wish to maintain the availability of Company-supplied gas. Also, it
90 is applied to customers receiving sales service under either Rate 6 - Large General
91 Service, or Rate 7 - Large Volume Service.

92 **Q. Please describe the Gas Cost (GC) charge.**

93 A. The GC charge is the sum of the CGC charge and the NCGC charge. It applies to all
94 sales service rates other than Rate 6 or Rate 7.

95 **Q. Please describe the Customer Select Balancing Charge (CSBC).**

96 A. The CSBC is applied to customers served under Rate 1 - Residential Service, Rate 4 -
97 General Service, and Rate 5 - Seasonal Use Service and who are participating in Nicor
98 Gas' Customer Select program under Rider 15. The CSBC primarily represents the non-
99 commodity gas costs of services used to balance the customer's deliveries with usage.
100 The CSBC includes costs for off-system storage services, certain other non-commodity
101 gas costs and may include costs associated with the purchase of supplies during periods
102 of Operational Flow Orders necessary to maintain the reliability of the system.

103 **Q Are these CSBC costs established within Rider 6?**

104 A. Yes. The CSBC is defined and established within Rider 6. End-use Customer Select
105 participants are billed CSBC charges pursuant to the terms of Riders 6 and 15. Revenue
106 derived from the CSBC is credited to the Company's non-commodity-related gas costs,
107 thereby reducing the NCGC charge.

108 **Q. Please describe the Transportation Service Adjustment (TSA).**

109 A. The TSA is a commodity-related charge or credit applied to the deliveries of all
110 customer-owned gas delivered to Transportation customers, including Rider 25 – Firm
111 Transportation Service and Rider 15 - Customer Select customers. The TSA is currently
112 a credit for the gross revenues derived from providing storage and transportation services
113 under the Company’s FERC Operating Statement and Rate 21 – Intrastate Transportation
114 and Storage Services, commonly referred to as Hub services. Sales customers receive an
115 equivalent credit or charge through an adjustment to the CGC component of the GC.

116 **Q Is the TSA established and applied through Rider 6?**

117 A. Yes. As established in Docket No. 04-0779 on October 4, 2005, a per therm credit or
118 charge is established on a monthly basis within Rider 6 to reflect the TSA. Revenues or
119 credits arising through the application of the Transportation Service Adjustment have
120 been included in the commodity-related gas costs.

121 **Q. Is there anything further you would like to explain with regard to how these charges**
122 **or credits are applied?**

123 A. Yes. While I described generally how each charge or credit is assessed, specific
124 application of these charges and adjustments vary depending on a customer’s rate and
125 elected level of backup service. These adjustments may also apply at the calculated level,
126 such as the CGC and the NCGC, or at a percentage of the calculated level, such as the
127 DGC. In addition, these charges and adjustments may apply to gas supplied by Nicor
128 Gas, as customer-owned gas, through either the customer’s total throughput, or a
129 percentage of the customer’s MDCQ. In addition, since August 15, 1997, the revenues

130 derived from authorized use, requested authorized use and unauthorized use therms sold
131 to transportation customers flow through as a credit to Rider 6 gas cost and are priced at
132 the higher of Nicor Gas' currently effective GC charge or the Market Price, which is
133 defined in the Company's Terms and Conditions as the average of the low and high
134 prices reported, the "index price", for deliveries of gas to the Chicago Citygate as
135 published in *Platts Gas Daily*.

136 **Q. What procedure does the Company follow to update its Rider 6 charges?**

137 A. In accordance with the provisions of Rider 6, each month Nicor Gas submits to the
138 Commission schedules specifying the amount of each Rider 6 charge. Each schedule
139 specifies the revised amount of each charge, along with a statement of details and data
140 showing Nicor Gas' calculations. The filings are mailed on or before the 20th day of the
141 month prior to the effective month in which the new Rider 6 charges are applied to
142 customer's bills.

143 **Q. Has Nicor Gas filed monthly purchased gas adjustment calculations for 2009 with**
144 **the Commission?**

145 A. Yes.

146 **Q. How are Nicor Gas' Rider 6 charges applied in billing the Company's customers?**

147 A. Rider 6 charges are effective on the first day of each calendar month. However, as a
148 practical matter, Nicor Gas bills customers on the basis of reading-day cycles that may
149 cover multiple calendar-month periods. For each customer billed, the meter reading dates
150 are the controlling factors. If, for example, a customer's meter is read on May 16th, and
151 had previously been read on April 16th, Nicor Gas assumes that 15/30 of the usage was

152 subject to the Rider 6 charges effective in April and 15/30 of the usage was subject to the
153 charges effective in May. Continuing the previous example, after prorating the amount
154 of metered gas usage between the months of April and May based on the number of days,
155 the appropriate monthly Gas Cost (“GC”) is separately applied to each month’s prorated
156 usage. Each month’s usage and corresponding GC are presented on the customer’s bill in
157 a manner that clearly illustrates both applicable GC rates. This method of proration is
158 embodied in the revenue calculations reflected in the Exhibits to this testimony.

159 **Q. Has the presentation of the prorated Rider 6 charges provided to customers**
160 **changed in 2009?**

161 A. No.

162 **Q. Are Nicor Gas’ Rider 6 charges adjusted through any other process?**

163 A. Yes. Rider 6 provides for an annual reconciliation, which is the purpose of this
164 proceeding.

165 **Q. What occurs during the reconciliation process?**

166 A. Generally speaking, as noted above, the revenue the Company recovered under its
167 Rider 6 charges is compared with the Company’s actual Cost of Gas Distributed for the
168 preceding year. If Nicor Gas’ Rider 6 charges recovered a different amount of revenue
169 than the Company’s actual Cost of Gas Distributed, then the Rider 6 charges are set at the
170 level such that the difference is either credited to or collected from customers, depending
171 on whether there was an over- or under-recovery, over the course of the following year.

172 **Q. Is each cost category reconciled?**

173 A. Yes. Pursuant to Rider 6, revenues recovered under the CGC and TSA charges are
174 reconciled with recoverable CGC; and revenues recovered under the DGC, NCGC and
175 CSBC charges are reconciled with recoverable NCGC.

176 **Q. Does proration of the Rider 6 charges or the proration of monthly usage complicate
177 a reconciliation of recovered revenues with allowable recoverable gas costs?**

178 A. No. It is only the total amount of revenues recovered through each Rider 6 charge over
179 the preceding year that is relevant for performing the annual reconciliation.

180 **Q. Is the cost of gas used by the Company during the 2009 reconciliation period
181 reflected in the amount to be recovered through the Company's Rider 6
182 reconciliation?**

183 A. No. The cost of gas used by the Company is excluded from the Gas Supply Cost charges
184 established in Rider 6.

185 **IV. ANNUAL RECONCILIATION OF RIDER 6**

186 **Q. Was an annual reconciliation statement for 2009 filed in accordance with Rider 6?**

187 A. Yes. Nicor Gas' annual statement for the year 2009 is being filed simultaneously with
188 this testimony on April 13, 2010 and is attached hereto as Exhibit BOB 2.2.

189 **Q. Please briefly describe the items contained within the filing.**

190 A. Exhibit BOB 2.2 consists of ten (10) pages, the first page of which is a transmittal letter.
191 The next nine (9) pages, or through page 10, represent the Company's annual
192 reconciliation for 2009.

193 **Q. What is contained within the portion of the Company’s filing that represents the**
194 **reconciliation for the year 2009?**

195 A. The first of the nine (9) remaining pages of Exhibit BOB 2.2 is the Independent Auditor’s
196 Report issued by Deloitte & Touche LLP for the portion of the filing that represents the
197 year 2009 reconciliation. The next page, or page 3, is a summary calculation of the
198 reconciliation for the year 2009. Exhibit BOB 2.2 pages 4 and 5 contain a detailed
199 explanation of the basis for the summary calculation of the 2009 reconciliation. The next
200 two pages, or pages 6 and 7, represent the detailed reconciliations of the CGC and
201 NCGC, respectively (the “Reconciliation Balances”). Exhibit BOB 2.2 pages 8 and 9
202 summarize the information included in the Company’s monthly filings for the CGC and
203 NCGC, respectively (the “PGA Reconciliations”). The final page is the Verification of
204 Mr. Gerald P. O’Connor, Senior Vice President Finance and Strategic Planning.

205 **Q. Would you please explain the Summary Reconciliation in more detail?**

206 A. Yes. This statement compares the total revenues recorded under the various charges of
207 the Company’s Rider 6 provisions, with the appropriate category of recoverable Cost of
208 Gas Distributed, to arrive at the balance to be credited or recovered under the two
209 individual reconciliation balances. In other words, it sets forth the overall reconciliation
210 calculation, both based on a total of collected revenue against total actual Cost of Gas
211 Distributed, as well as broken down to the CGC and NCGC levels.

212 **Q. Does the Summary Reconciliation indicate that the Company’s Rider 6 charges**
213 **over- or under-recovered the Company’s actual Cost of Gas Distributed for the year**
214 **2009?**

215 A. The calculation shows an over-recovery. In particular, the Company's CGC charge over-
216 recovered CGC by \$2,597,145, and the NCGC charge over-recovered NCGC by
217 \$2,553,678. This represents a total amount to be credited to customers for the year 2009
218 of \$5,150,823.

219 **Q. Does the Summary Reconciliation also account for any adjustments included in**
220 **Commission proceedings regarding any prior reconciliations that the Company has**
221 **filed?**

222 A. No.

223 **Q. Were there any specific adjustments separately reported in the monthly filings for**
224 **the 2009 reconciliation year?**

225 A. No.

226 **Q. Would you please describe the Reconciliation Balance for the CGC in more detail?**

227 A. Yes. This is a detailed reconciliation that reflects the monthly amounts of recoverable
228 commodity-related gas costs and revenues which were recorded under the Company's
229 CGC pursuant to Rider 6 for the 2009 reconciliation year.

230 **Q. Has the over-recovered commodity-related Reconciliation Balance of \$2,597,145**
231 **been reflected in the Company's CGC charges?**

232 A. Yes. The Company has credited \$2,597,145. The over-recovered amount has been
233 reflected in the CGC charges as Factor "A" amounts and as an additional reduction to gas
234 charges effective for the month of January 2010.

235 **Q. Is the line item identified as “Commodity Related Over/(Under) Collection” on the**
236 **Reconciliation Balance for CGC the same as the line identified as “Under/(Over)**
237 **Recovery Balance at 12/31/09” on the PGA Reconciliation for CGC?**

238 A. Yes. The Reconciliation Balance does not include any adjustments for the prior year’s
239 Factor O.

240 **Q. What does Factor O represent?**

241 A. Factor O represents additional over- or under-recovery for a reconciliation year ordered
242 by the Commission to be credited or collected including interest from the end of the
243 reconciliation year to the Order date in the reconciliation proceeding.

244 **Q. Please describe the Reconciliation Balance for NCGC in more detail.**

245 A. Like the Reconciliation Balance for CGC, this is a detailed reconciliation that reflects the
246 monthly amounts of recoverable non-commodity-related gas costs and revenues, which
247 were recorded under the Company’s NCGC and DGC pursuant to Rider 6 for the 2009
248 reconciliation year.

249 **Q. Has the balance to be refunded of \$2,553,678 been reflected in the Company’s DGC**
250 **and NCGC charges?**

251 A. Yes. The Company has credited \$2,553,678. The over-recovered amount has been
252 reflected in the DGC and NCGC charges effective for the months of January and
253 February 2010.

254 **Q. Is the line item identified as “Non-Commodity Related Over/(Under) Collection” on**
255 **the Reconciliation Balance for NCGC the same as the line item “Under/(Over)**
256 **Recovery Balance at 12/31/09” on the PGA Reconciliation of NCGC?**

257 A. Yes. The reconciliation balance does not include any adjustments for the prior year's
258 Factor O.

259 **V. EXPLANATIONS - INDIVIDUAL LINE ITEMS**

260 **Q. Please explain the revenue item on the Reconciliation Balance for CGC entitled**
261 **“Excess Storage Charges.”**

262 A. Pursuant to tariffs approved in Docket No. 95-0219, Nicor Gas' transportation service
263 customers are allowed to store certain volumes of customer-owned gas in Nicor Gas'
264 storage facilities. When a customer's actual storage balance is in excess of the allowed
265 storage balance, the excess storage balance volume is subject to an Excess Storage
266 Charge of \$0.10 per therm. All such Excess Storage Charge revenue billed to customers
267 is credited through the Commodity Related Reconciliation Balance, in compliance with
268 the Commission's Orders in Docket No. 95-0219.

269 **Q. Please explain the revenue item on the Reconciliation Balance for CGC entitled**
270 **“Chicago Hub.”**

271 A. Pursuant to the Commission's Order in Docket No. 04-0779, revenues arising from the
272 Chicago area Hub are required to be credited back to customers. Pursuant to the
273 Commission's Order in Docket No. 95-0219, Nicor Gas is also required to include
274 revenues received from the sales of storage services to off-system customers. Both
275 revenues are to be included as a credit to Rider 6 and identified in the commodity-related
276 Reconciliation Balance. In prior reconciliations, revenues from the sales of storage
277 services to off-system customers were individually identified as “Storage Services” in the
278 Reconciliation Balance. Today, the revenue item entitled “Chicago Hub” includes the

279 revenue credits for both the 2009 Hub revenues and the revenues billed in 2009 for off-
280 system storage services.

281 **Q. Please explain the revenue item shown on the Reconciliation Balance for CGC**
282 **“Rider 5 Revenues.”**

283 A. Rider 5, Storage Service Cost Recovery, was also approved by the Commission in
284 Docket No. 95-0219. Rider 5 ensures recovery of the Company’s storage-related
285 investments following elections made by transportation customers. The cost of storage
286 services not elected, if any, by transportation customers is recovered-from or credited-
287 back to sales customers through Rider 5, which is collected or refunded as part of the
288 monthly CGC charge for billing purposes. The adjustment reflected for Rider 5
289 eliminates this revenue from the Reconciliation Balance, since it is unrelated to gas costs
290 incurred.

291 **Q. Please explain why Rider 5 Revenues are not specifically identified for the months of**
292 **July through December 2009?**

293 A. As previously mentioned, Rider 5 Revenues are unrelated to gas costs. Prior to July 2009
294 Rider 5 Revenues were separately reported on the Commodity Related Reconciliation
295 Balance to reflect their exclusion from the revenues recorded under commodity charges.
296 In July 2009 the Company began the use of a new revenue accounting system which
297 excludes Rider 5 Revenues from the CGC through the reporting process. Consequently,
298 reporting Rider 5 Revenues is no longer necessary.

299 **Q. Please explain the revenue item entitled “Interest on Refunds,” as shown on the**
300 **Reconciliation Balance for CGC.**

301 A. Interest is calculated on the unamortized balances related to the amortization expenses
302 described above. Pursuant to 83 Ill. Adm. Code 525.50(b), the Company computes the
303 associated carrying charge on unamortized refunds and over/under collections, in effect at
304 the time the amortization is initiated, based on the rate established under 83 Ill. Adm.
305 Code 280.70(e)(1). Interest is included, through Factor A, with the CGC, NCGC and
306 DGC charges, as applicable.

307 **Q. Please explain the commodity-related cost line item shown on the Reconciliation**
308 **Balance for CGC entitled “Recovery From Hits By Contractor”.**

309 A. Recovery From Hits By Contractor represents revenues collected by the Company from
310 contractors whose damage to our facilities has resulted in gas losses. These revenues are
311 shown as a credit to recoverable CGC.

312 **Q. Please explain the revenue item shown on the Reconciliation Balance for NCGC**
313 **entitled “Customer Select Balancing Charge.”**

314 A. As previously explained, this revenue item shows the revenues collected through the
315 application of the CSBC through December 31, 2009.

316 **Q. The Reconciliation Balances for both CGC and NCGC contain a line item entitled**
317 **“Amortization of Previous Years RB.” What do these line items represent?**

318 A. Pursuant to the Commission’s Order in Docket No. 94-0403, 83 Ill. Adm. Code 525.50(b)
319 allows the Company to amortize an Adjustment Factor (“Factor A”) over a period longer
320 than the Base Period, as defined in 83 Ill. Adm. Code 525.20, but not to exceed
321 12 months. These line items represent the amortization of the prior year’s over- or under-

322 collected gas costs. Prior to the Commission's Order in Docket No. 94-0403,
323 amortization expense was reflected outside the calculation of the Reconciliation Balance.

324 **VI. OVERSIGHT**

325 **Q. In conjunction with the submittal of the Annual Reconciliation Filing with the**
326 **Commission, has the Company's annual reconciliation been the subject of an**
327 **independent audit?**

328 A. Yes. The 2009 Annual Reconciliation Filing has been audited by Deloitte & Touche
329 LLP, the Company's independent public accountants. Their report is included as part of
330 the Company's filing pursuant to Rider 6. The reconciliation itself is prepared by Nicor
331 Gas employees from several departments.

332 **Q. What type of review procedure is in place for the monthly GSC filings?**

333 A. The Rate, Gas Supply, Gas Supply Accounting and Forecasting Departments contribute
334 to preparation of the monthly filings. The departments are familiar with the terms and
335 provisions of Rider 6, and understand which costs are recoverable through each
336 subsection of the GSC. The Rate Department prepares the final document filed with the
337 Commission. Forecasting, Gas Supply and Gas Supply Accounting are involved in
338 preparation of the documents used to support the filing.

339 **Q. How do these departments provide a check on the accuracy of the monthly filings?**

340 A. These departments must be in agreement with the treatment of costs in the monthly GSC
341 filing.

342 **Q. What other review is performed with regard to monthly filings?**

343 A. On an annual basis, the Company's Internal Auditing Department reviews a monthly
344 filing, corresponding source documents and a copy of Rider 6 as in effect at the time of
345 the filing. This review is designed to ensure that only appropriate costs were included in
346 the filing and that the filing is consistent with the guidelines set forth in the 83 Illinois
347 Administrative Code, Part 525. Internal Auditing's review provides a further check on
348 the inter-departmental review that I have previously described.

349 **VII. CONCLUSION**

350 **Q. What is the Company requesting?**

351 A. The Company is requesting that the Commission approve Nicor Gas' GSC charges at
352 levels established in the Company's 2009 PGA Reconciliation. In addition, the Company
353 is requesting that the Commission approve the \$5,150,823 customer credit through the
354 Company's Rider 6, GSC charges, which resulted from the over-collection of actual
355 Commodity Gas Cost in the amount of \$2,597,145 and the over-collection of actual Non-
356 Commodity Gas Costs in the amount of \$2,553,678.

357 **Q. Does this conclude your direct testimony?**

358 A. Yes.