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Citizens Utilities Company

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Phoenix, AZ 85012-2736
Direct Dial: (602) 532-4400
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JAN 29 3 50 PM '99

January 29, 1999

Deborah R. Scott
Senior Attorney

Docketing Division
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

Arizona Corporation Commission

DOCKETED

JAN 29 1999

DOCKETED BY

Dear Sirs:

Pursuant to Decision No. 61225 (October 30, 1998), Citizens Utilities Company ("Citizens" or "Company"), Northern Arizona Gas Division ("NAGD") and its Santa Cruz Gas Division ("SCGD") hereby files with the Arizona Corporation Commission ("Commission") certain tariff pages, report formats, and other information necessary to implement the new PGA mechanism. Also included, as required by the Commission, is a plan to educate customers on the new PGA mechanism. Below, please find a description of each attachment supporting this compliance filing:

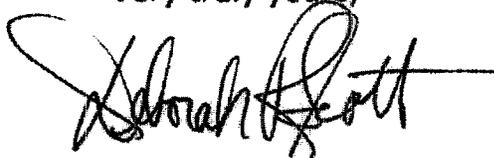
NAGD ATTACHMENTS

- Attachment-1: This attachment is the Special Rate Rider Tariff that sets forth certain guidelines governing the Purchase Gas Adjustment ("PGA") clause for the NAGD. This tariff will supersede NAGD's Revised Sheet No. 42 that was approved for filing through Decision No. 60052 (February 6, 1997);
- Attachment-2: This attachment represents the proposed PGA Tariff Sheet to be sent to the Commission Staff each month that sets forth the PGA rate in effect for the month. *Note: This Tariff is in the same format currently being used by the NAGD whose PGA mechanism is very similar to the new mechanism approved in Decision No. 61225;*
- Attachment-3: This attachment includes the format in which the Company proposes to file the three standard monthly PGA exhibits required by the Commission. The Company will also furnish, in the same format currently used by the NAGD as a part of their monthly informational filings made with the Commission, all invoices, transportation purchase reports and other necessary documentation to validate charges made to the PGA bank balance.

- REC-1000-0145
- Provide training to all customer service representatives so they will be able to respond to inquiries about the PGA from the public.
 - Have written materials available in the Citizens' offices for the public.

If you have any questions or require further information regarding this filing, please contact Mr. Carl Dabelstein, Vice President, Regulatory Affairs - Citizens Utilities Company, Public Service Sector, at (602) 532-4424 or Mr. Charles Loy, Manager, Regulatory Affairs, at (602) 532-4426.

Very truly yours,



Deborah Scott
Senior Attorney

Attachments

cc RUCO

SPECIAL RATE RIDER

Attachment - 1

RATE RIDER NO. 1

Purchased gas adjustment clause.

APPLICABILITY

Applicable to all sales rate schedules, unless otherwise specified.

CHANGE IN RATES

Sales rate schedules include a base cost of gas ("BCOG") of \$0.25 per therm. The \$0.25 per therm is based on a commodity cost component of \$0.17 per therm and a transportation fixed and variable cost component of \$0.08 per therm. In accordance with Decision No. 61225 issued by the Commission, a monthly adjustment to the BCOG will be made through a change in the Purchased Gas Adjustment ("PGA") rate, that is based upon the rolling twelve month average of actual purchased gas costs and sales. The Commission has banded the PGA rate change so that the new PGA rate calculated for the month cannot be more than \$0.07 per therm different than the PGA rate in effect during any of the preceding 12 months, unless authorized by the Commission. Additional Requirements are stated below.

BANK BALANCE

The Company shall maintain an account to assure that it will neither over or under collect, except to the extent authorized, as a result of adjustment in rates determined under the operation of this tariff. Entries shall be made monthly to reflect the amounts paid to suppliers for gas as recorded in the FERC series of accounts numbered 800 through 806, less the Base Cost of such gas (adjusted volumes multiplied by the Base Price) and revenues produced by the operation of this tariff and any other refunds or payments authorized by the Commission. Interest will be applied to over and under collected bank balances based on the non-financial 3-month commercial paper rate for each month, contained in the Federal Reserve Statistical Release, G-13, or its successor publication.

MONTHLY INFORMATION FILINGS

Each month, the Company shall make a cost of gas information filing that shall include gas volumes and costs by supply source; supplier refunds, credits, and billing adjustments; and lost and unaccounted for gas. Each filing shall include monthly sales revenues, volumes, and number of customers by class. The filing should also include historical summaries of actual 12 month purchase gas volumes, costs and sales activity to support the computation of the monthly PGA rate, in the format required by Decision No. 61225.

ADDITIONAL REQUIREMENTS

A special PGA review is required if the PGA bank balance reaches an over or under collection in the amount of \$4,200,000. The Company must file for an application for an adjustment within 45 days of completing the Monthly Informational Filing that illustrates the threshold has been exceeded or contact the Commission to discuss why a PGA rate adjustment is not necessary at this time. The Commission, upon review, may authorize the balance to be amortized through a pre-determined rate included as part of the PGA for a specified period. Lost and unaccounted for gas recovery is limited to the lesser of the actual costs incurred or 3.50% of total annual throughput.

Effective Date _____
Filed by Daniel McCarthy, Vice President and General Manager

Authority ARIZONA CORPORATION COMMISSION

0400-NOV-98

Citizens Utilities Company
Northern Arizona Gas Division
(Name of Company)

Rate Rider No. 1D Sheet No. 29
Canceling
Rate Rider No. 1D Sheet No. 28
Previously Authorized by Decision No. 60346

Applies to All Service Areas in Northern Arizona

Attachment - 2

NATURAL GAS RATES
PURCHASED GAS ADJUSTMENT (PGA) TO RATES
RATE RIDER NO. 1D

APPLICABILITY: The following adjustments shall be applied to the price for each therm delivered to all classes of sales served by the Northern Arizona Gas Division of Citizens Utilities Company.

Month/Year	Rate Schedule	Effective Date	Customer Class	PGA This Period	PGA Last Period	Change
January 1998	All Sales*	January 2, 1998	All Sales*	\$0.1634	\$0.1428	\$0.0206
February 1998	All Sales*	January 30, 1998	All Sales*	\$0.1490	\$0.1634	(\$0.0144)
March 1998	All Sales*	March 2, 1998	All Sales*	\$0.1167	\$0.1490	(\$0.0323)
April 1998	All Sales*	March 31, 1998	All Sales*	\$0.0671	\$0.1167	(\$0.0496)
May 1998	All Sales*	April 30, 1998	All Sales*	\$0.0627	\$0.0671	(\$0.0044)
June 1998	All Sales*	May 29, 1998	All Sales*	\$0.0674	\$0.0627	\$0.0047
July 1998	All Sales*	June 29, 1998	All Sales*	\$0.0615	\$0.0674	(\$0.0059)
August 1998	All Sales*	July 29, 1998	All Sales*	\$0.0570	\$0.0615	(\$0.0045)
September 1998	All Sales*	August 27, 1998	All Sales*	\$0.0603	\$0.0570	\$0.0033
October 1998	All Sales*	September 28, 1998	All Sales*	\$0.0695	\$0.0603	\$0.0092
November 1998	All Sales*	October 27, 1998	All Sales*	\$0.0652	\$0.0695	(\$0.0043)
December 1998	All Sales*	November 25, 1998	All Sales*	\$0.0305	\$0.0652	(\$0.0347)
January 1999	All Sales*	December 30, 1998	All Sales*	\$0.0124	\$0.0305	(\$0.0181)

*All sales customers who purchase gas are affected by the PGA rate increase authorized by Decision No. 60052 and Decision No. 60346. Transportation rates are unaffected.

Issued December 10 1998
Month Day Year

Effective December 30 1998
Month Day Year

Issued by Daniel McCarthy, General Manager, Arizona Energy, Citizens Utilities Company,
420 North San Francisco Street, Flagstaff, Arizona 86001
Address of Officer

COMPANY NAME: Citizens Utilities Company Northern Arizona Gas Division
PREPARER'S NAME: William L. Autin
PHONE NO.: (504) 374-7347

ATTACHMENT - 3
PAGE 2 OF 3

EXHIBIT B

SALES - PURCHASES DATA
MONTH OF DECEMBER 1999

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LINE NO.		
	SALES (THERMS)	
1	RESIDENTIAL	
2	COMMERCIAL	
3	INDUSTRIAL	
4	IRRIGATION	
5	MUNICIPALITY	
6	TOTAL SALES (THERMS)	_____
	SALES (DOLLARS)	
7	RESIDENTIAL	
8	COMMERCIAL	
9	INDUSTRIAL	
10	IRRIGATION	
11	MUNICIPALITY	
12	TOTAL SALES (DOLLARS)	\$ _____
	NUMBER OF CUSTOMERS	
13	RESIDENTIAL	
14	COMMERCIAL	
15	INDUSTRIAL	
16	IRRIGATION	
17	MUNICIPALITY	
18	TOTAL CUSTOMERS	_____
19	PURCHASES (THERMS)	_____
20	PURCHASES (DOLLARS)	\$ _____
21	TRANSPORTATION COSTS	\$ _____

COMPANY NAME Citizens Utilities Company Northern Arizona Gas Division
PREPARED BY NAME William L. Aulin
PHONE NO. (504) 374-1347

EXHIBIT C

PGA ROLLING AVERAGE CALCULATIONS
MONTH OF DECEMBER 1998

LINE NO	DATE	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I) + (K)	(J)	(K) / (F)	(L)
		MONTHLY COMMODITY COST INVOICED	MONTHLY TRANSPORTATION COST INVOICED	MONTHLY TOTAL GAS COST	PURCHASED VOLUMES THERMS	PURCHASED PER THERM	MONTHLY SALES THERMS	12 MTH ENDING COMMODITY COST INVOICED	12 MTH ENDING TRANSPORTATION COST INVOICED	12 MTH ENDING TOTAL GAS COST	12 MTH ENDING SALES THERMS	MONTHLY AVERAGE TOTAL GAS COST PER THERM SOLD	12 MONTH ENDING ROLLING AVERAGE TOTAL GAS COST PER THERM SOLD
1	JAN 1998	\$1,000,000	\$250,000	\$1,250,000	4,250,000	\$0.2941	\$9,000,000	\$3,000,000	\$12,000,000	39,000,000	\$0.3125	\$0.3077	
2	FEB	\$900,000	\$250,000	\$1,150,000	4,000,000	\$0.2875	\$9,100,000	\$3,000,000	\$12,100,000	38,000,000	\$0.3087	\$0.3184	
3	MAR	\$800,000	\$250,000	\$1,050,000	3,750,000	\$0.2800	\$9,200,000	\$3,000,000	\$11,900,000	38,500,000	\$0.3091	\$0.3091	
4	APR	\$700,000	\$250,000	\$950,000	3,500,000	\$0.2714	\$9,300,000	\$3,000,000	\$12,200,000	40,000,000	\$0.2923	\$0.3050	
5	MAY	\$700,000	\$250,000	\$950,000	3,500,000	\$0.2714	\$9,175,000	\$3,000,000	\$12,175,000	39,500,000	\$0.3016	\$0.3082	
6	JUN	\$600,000	\$250,000	\$850,000	2,750,000	\$0.3091	\$9,000,000	\$3,000,000	\$12,000,000	39,000,000	\$0.3086	\$0.3080	
7	JUL	\$600,000	\$250,000	\$850,000	2,750,000	\$0.3091	\$9,100,000	\$3,000,000	\$12,100,000	38,750,000	\$0.3087	\$0.3044	
8	AUG	\$700,000	\$250,000	\$950,000	3,500,000	\$0.2714	\$9,050,000	\$3,000,000	\$12,050,000	39,000,000	\$0.3080	\$0.3090	
9	SEP	\$700,000	\$250,000	\$950,000	3,500,000	\$0.2714	\$9,175,000	\$3,000,000	\$12,175,000	38,000,000	\$0.3204	\$0.3204	
10	OCT	\$800,000	\$250,000	\$1,050,000	4,000,000	\$0.2625	\$9,000,000	\$3,000,000	\$12,000,000	33,800,000	\$0.3547	\$0.3587	
11	NOV	\$800,000	\$250,000	\$1,050,000	4,000,000	\$0.2625	\$9,200,000	\$3,000,000	\$12,200,000	38,050,000	\$0.2941	\$0.3208	
12	DEC	\$1,000,000	\$250,000	\$1,250,000	4,250,000	\$0.2941							

13 12 MONTH ENDING ROLLING AVERAGE TOTAL GAS COST PER THERM SOLD: \$0.3206
 14 BASE COST OF GAS PER THERM: \$0.2500
 15 PGA ROLLING AVERAGE PER THERM: \$0.2706 (G)

Highest PGA Rate Per Therm - Previous 12 Months \$0.1097
 Lowest PGA Rate Per Therm - Previous 12 Months \$0.0544
 March 1998 PGA Rate \$0.0706 (G)

(G) Although the PGA rate can fluctuate monthly, the Commission has established that the new PGA rate for the month cannot be more than \$0.07 per therm different than the PGA rate in effect during any of the preceding 12 months.

CITIZENS UTILITIES COMPANY

ORIGINAL SHEET NO. 101

SANTA CRUZ GAS DIVISION

CANCELLING SHEET NO. --

Applies to City of Nogales and Santa Cruz County

SPECIAL RATE RIDER

ATTACHMENT - 4

RATE RIDER NO. 1

Purchased gas adjustment clause.

APPLICABILITY

Applicable to all sales rate schedules, unless otherwise specified.

CHANGE IN RATES

Sales rate schedules include a base cost of gas ("BCOG") of \$0.33804 per therm. In accordance with Decision No. 61225 issued by the Commission, a monthly adjustment to the BCOG will be made through a change in the Purchased Gas Adjustment ("PGA") rate, that is based upon the rolling twelve month average of actual purchased gas costs and sales. The Commission has banded the PGA rate change so that the new PGA rate calculated for the month cannot be more than \$0.07 per therm different than the PGA rate in effect during any of the preceding 12 months, unless authorized by the Commission. Additional Requirements are stated below.

BANK BALANCE

The Company shall maintain an account to assure that it will neither over or under collect, except to the extent authorized, as a result of adjustment in rates determined under the operation of this tariff. Entries shall be made monthly to reflect the amounts paid to suppliers for gas as recorded in the FERC series of accounts numbered 800 through 806, less the Base Cost of such gas (adjusted volumes multiplied by the Base Price) and revenues produced by the operation of this tariff and any other refunds or payments authorized by the Commission. Interest will be applied to over and under collected bank balances based on the non-financial 3-month commercial paper rate for each month, contained in the Federal Reserve Statistical Release, G-13, or its successor publication.

MONTHLY INFORMATION FILINGS

Each month, the Company shall make a cost of gas information filing that shall include gas volumes and costs by supply source; supplier refunds, credits, and billing adjustments; and lost and unaccounted for gas. Each filing shall include monthly sales revenues, volumes, and number of customers by class. The filing should also include historical summaries of actual 12 month purchase gas volumes, costs and sales activity to support the computation of the monthly PGA rate, in the format required by Decision No. 61225.

ADDITIONAL REQUIREMENTS

A special PGA review is required if the PGA bank balance reaches an over or under collection in the amount of \$250,000. The Company must file for an application for an adjustment within 45 days of completing the Monthly Informational Filing that illustrates the threshold has been exceeded or contact the Commission to discuss why a PGA rate adjustment is not necessary at this time. The Commission, upon review, may authorize the balance to be amortized through a pre-determined rate included as part of the PGA for a specified period.

Effective Date _____

Authority ARIZONA CORPORATION COMMISSION

Filed by Daniel McCarthy, Vice President and General Manager

NATURAL GAS RATES

ATTACHMENT - 5

<u>Citizens Utilities Company</u>	A.C.C. Schedule No.	N-13
<u>Mogalec, Arizona</u>		
<u>Dan McCarthy, Vice President</u>	Cancelling A.C.C. Schedule No.	N-12

GENERAL GAS SERVICE RATE

AVAILABILITY

Available in all territory served by the Company in Santa Cruz County, Arizona.

APPLICABILITY

Applicable for general service of natural gas where service is for the exclusive use of the Customer.

<u>RATE:</u>	<u>(A)</u>	<u>Surcharge Per Therm (B)</u>	<u>PGA Rate Per Therm (C)</u>	<u>Effective MM/DD/YY</u>
First 4.53 Therms per month or less (previously first 500 Cu. Ft. per month or less)	\$7.02	\$0.0000	(\$0.0917)	\$6.60
Next 4.53 Therms per month; per therm (previously next 500 Cu. Ft. per month; per 100 Cu. Ft.)	\$0.9267	\$0.0000	(\$0.0917)	\$0.8351
Next 18.11 Therms per month; per therm (previously next 2,000 Cu. Ft. per month; per 100 Cu. Ft.)	\$0.6827	\$0.0000	(\$0.0917)	\$0.5910
Next 63.38 Therms per month; per therm (Previously next 7,000 Cu. Ft. per month; per 100 Cu. Ft.)	\$0.5794	\$0.0000	(\$0.0917)	\$0.4877
Next 362.17 Therms per month; per therm (previously next 40,000 Cu. Ft. per month; per 100 Cu. Ft.)	\$0.5328	\$0.0000	(\$0.0917)	\$0.4411
All over 452.72 Therms per month; per therm (previously all over 50,000 Cu. Ft. per month; per 100 Cu. Ft.)	\$0.5094	\$0.0000	(\$0.0917)	\$0.4177

RATE ADJUSTMENT

The rates stated herein shall be subject to such adjustment as may be necessary to reflect any increase or decrease in cost to the Company of gas either generated or purchased above or below the base cost of \$0.33804 per therm.

<u>RATE:</u>	<u>Effective MM/DD/YY</u>
Minimum bill per meter, per month: <small>NOTE: Minimum Bill = \$7.02 = 4.53 Therms x Surcharge rate + PGA rate per Therm</small>	\$6.60

EFFECTIVE DATE

- (A) These rates shall become effective for usage on and after August billings in accordance with Decision No. 55535, dated April 23, 1987.
- (B) This surcharge shall become effective for bills rendered on and after MM/DD/YY Workday-1 billings in accordance with Decision No. 77777, dated MM/DD/YY.
- (C) The new PGA mechanism and resultant PGA rates shall take effect beginning June 1, 1999, in accordance with Decision No. 61225, dated October 30, 1998.

DATE: 11-03-1999 10:00 AM

COMPANY NAME: Citizens Utilities Company Santa Cruz Gas Division
 PREPARER'S NAME: XXXXXXXXXXXXX
 PHONE NO.: (504) 374-7347

EXHIBIT A

BANK BALANCE FORMAT
 MONTH OF DECEMBER 1999

LINE NO.

1	BEGINNING BANK BALANCE		\$	_____
2	COST OF PURCHASED GAS (EXHIBIT B, LINE 20)	\$		
3	TRANSPORTATION COSTS (EXHIBIT B, LINE 21)	\$		
4	TOTAL COST TO BE RECOVERED (1+2+3)			<u>\$0.00</u>
5	SALES - THERMS (EXHIBIT B, LINE 8)		0	
6	BASE PERIOD FUEL COST PER THERM		\$0.33804	
7	AMOUNT RECOVERED BY BASE PERIOD GAS COSTS (5 X 6)			<u>\$0.00</u>
8	SALES - THERMS (EXHIBIT B, LINE 6)		0	
9	ROLLING AVERAGE PGA-PER THERM (EXHIBIT C, LINE 17)		<u>(\$0.0174)</u>	
10	AMT. RECOVERED FROM ROLLING AVG (8 X 9)			<u>\$0.00</u>
11	TOTAL AMOUNT RECOVERED (7 + 10)			<u>\$0.00</u>
12	ADJUSTMENTS (PLEASE ATTACH EXHIBIT)	A	\$	_____
13	MONTHLY SUBTOTAL (4-11+ OR - 12)			<u>\$0.00</u>
14	MONTHLY INTEREST RATE = 2.77% (LINE 1 * RATE)/12 MONTHS		\$	_____
15	END OF MONTH BANK BALANCE (13 + OR - 14)			<u><u>\$0.00</u></u>

A Please attach schedule indicating the exact nature of adjustment and if applicable calculation of adjustment.

PGASCNEW.WM4

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COMPANY NAME: Citizens Utilities Company Santa Cruz Gas Division
PREPARER'S NAME: XXXXXXXXXXXXXXX
PHONE NO.: (504) 374-7347

ATTACHMENT - 6
PAGE 2 OF 3

EXHIBIT B

SALES - PURCHASES DATA
MONTH OF DECEMBER 1998

LINE NO.

- SALES (THERMS)
- 1 RESIDENTIAL
- 2 COMMERCIAL
- 3 INDUSTRIAL
- 4 IRRIGATION
- 5 MUNICIPALITY
- 6 TOTAL SALES (THERMS)

- SALES (DOLLARS)
- 7 RESIDENTIAL
- 8 COMMERCIAL
- 9 INDUSTRIAL
- 10 IRRIGATION
- 11 MUNICIPALITY
- 12 TOTAL SALES (DOLLARS)

\$ _____

- NUMBER OF CUSTOMERS
- 13 RESIDENTIAL
- 14 COMMERCIAL
- 15 INDUSTRIAL
- 16 IRRIGATION
- 17 MUNICIPALITY
- 18 TOTAL CUSTOMERS

19 PURCHASES (THERMS)

20 PURCHASES (DOLLARS)

\$ _____

21 TRANSPORTATION COSTS

\$ _____

FOOTNOTES

EXHIBIT C

PGA ROLLING AVERAGE CALCULATIONS
 MONTH OF DECEMBER, 1989

LINE NO.	DATE	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
		MONTHLY COMMODITY COST INVOICED	MONTHLY TRANSPORTATION COST INVOICED	MONTHLY TOTAL GAS COST	PURCHASED THERMS	PURCHASED VOLUMES THERMS	MONTHLY SALES THERMS	12 MTH ENDING COMMODITY COST INVOICED	12 MTH ENDING TRANSPORTATION COST INVOICED	12 MTH ENDING TOTAL GAS COST	12 MTH ENDING SALES THERMS	MONTHLY AVERAGE TOTAL GAS COST PER THERM SOLD	12 MONTH ENDING ROLLING AVERAGE TOTAL GAS COST PER THERM SOLD
1	JAN 1989	\$1,000,000	\$250,000	\$1,250,000	4,250,000	4,000,000	4,000,000	\$9,000,000	\$3,000,000	\$12,000,000	38,000,000	\$0.3125	\$0.3077
2	FEB	\$900,000	\$250,000	\$1,150,000	4,000,000	3,750,000	3,750,000	\$8,000,000	\$3,000,000	\$11,000,000	38,000,000	\$0.3087	\$0.3184
3	MAR	\$800,000	\$250,000	\$1,050,000	3,750,000	3,500,000	3,500,000	\$7,000,000	\$3,000,000	\$10,000,000	39,000,000	\$0.3000	\$0.3081
4	APR	\$700,000	\$250,000	\$950,000	3,500,000	3,250,000	3,250,000	\$6,000,000	\$3,000,000	\$9,000,000	40,000,000	\$0.2923	\$0.3050
5	MAY	\$600,000	\$250,000	\$850,000	3,250,000	3,000,000	3,000,000	\$5,000,000	\$3,000,000	\$8,000,000	39,500,000	\$0.3016	\$0.3082
6	JUN	\$500,000	\$250,000	\$750,000	2,750,000	2,500,000	2,500,000	\$4,000,000	\$3,000,000	\$7,000,000	39,000,000	\$0.3400	\$0.3077
7	JUL	\$400,000	\$250,000	\$650,000	2,500,000	2,250,000	2,250,000	\$3,000,000	\$3,000,000	\$6,000,000	39,000,000	\$0.3088	\$0.3080
8	AUG	\$300,000	\$250,000	\$550,000	2,250,000	2,000,000	2,000,000	\$2,000,000	\$3,000,000	\$5,000,000	39,000,000	\$0.3017	\$0.3044
9	SEP	\$200,000	\$250,000	\$450,000	2,000,000	1,750,000	1,750,000	\$1,000,000	\$3,000,000	\$4,000,000	36,000,000	\$0.3000	\$0.3090
10	OCT	\$100,000	\$250,000	\$350,000	1,750,000	1,500,000	1,500,000	\$800,000	\$3,000,000	\$3,800,000	33,800,000	\$0.3500	\$0.3204
11	NOV	\$0,000	\$250,000	\$250,000	1,500,000	1,250,000	1,250,000	\$600,000	\$3,000,000	\$3,600,000	33,800,000	\$0.3286	\$0.3587
12	DEC	\$1,000,000	\$250,000	\$1,250,000	4,250,000	4,000,000	4,000,000	\$9,000,000	\$3,000,000	\$12,000,000	38,050,000	\$0.2941	\$0.3296

12 MONTH ENDING ROLLING AVERAGE TOTAL GAS COST PER THERM SOLD: \$0.32063
 BASE COST OF GAS PER THERM: \$0.33804
 PGA ROLLING AVERAGE PER THERM: (\$0.3174)

Highest PGA Rate Per Therm - Previous 12 Months (\$0.0917)
 Lowest PGA Rate Per Therm - Previous 12 Months (\$0.0917)
 March 1989 PGA Rate (\$0.0174) (2)

(2) Although the PGA rate can fluctuate monthly, the Commission has established that the new PGA rate for this month cannot be more than \$0.07 per therm different than the PGA rate in effect during any of the preceding 12 months.