

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS ADJUSTMENT	)	CASE NO.
FILING OF NATURAL ENERGY UTILITY	)	2024-00369
CORPORATION	)	

ORDER

On November 19, 2024, Natural Energy Utility Corporation (Natural Energy) filed its proposed Gas Cost Recovery (GCR) rate report to be effective January 1, 2025. The GCR rate report consisted of the report as well as Natural Energy's response to Commission Staff's First Request for Information, attached to the Commission's October 9, 2024 final Order in Case No. 2024-00295¹ (Natural Energy's response to Case No. 2024-00295 Request).² After reviewing the GCR rate report and Natural Energy's responses, the Commission determined that further discovery was necessary to gather information pertaining to Natural Energy's future GCR rate reports. On December 26, 2024, the Commission issued an Order suspending Natural Energy's proposed GCR rate for one day, until January 2, 2025, to give the Commission time to investigate the proposed GCR rates, and to allow Natural Energy to begin charging the GCR rates, subject to refund, provided it submits written notice to the Commission of its intention to do so as required by KRS 278.190(2). Natural Energy's prior Commission approved GCR

¹ Case No. 2024-00295, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (Ky. PSC Oct. 9, 2024), final Order, Appendix B.

² See, Application (filed Nov. 19, 2024), Answer_-_Question_1.pdf and Answer_-_Questions_2-7.pdf.

rate was provided in Case No. 2024-00295.³ Natural Energy's proceeding quarterly GCR rate reports in Case Nos. 2025-00049⁴ and 2025-00149⁵ have been suspended by the Commission for the purpose of gathering discovery regarding the handling of its Special Contract Customers and the calculation of the GCR rate mechanism.⁶ Natural Energy also has filed its quarterly GCR rate report filing for rates effective October 1, 2025, in Case No. 2025-00270.⁷

Natural Energy responded to two requests for information from Commission Staff,⁸ in addition to Natural Energy's response to Case No. 2024-00295 Request. There are no intervenors in this proceeding. This matter now stands submitted for a decision on the written record.

LEGAL STANDARD

The Commission's standard of review for GCR rates is well settled as stated in KRS 278.274(1):

In determining whether proposed natural gas utility rates are just and reasonable, the commission shall review the utility's gas purchasing practices. The commission may disallow any costs or rates which are deemed to result from imprudent purchasing practices on the part of the utility.

³ Case No. 2024-00295, (Ky. PSC Oct. 9, 2024), final Order at 3.

⁴ Case No. 2025-00049, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (filed Feb. 26, 2025), GCR rate report (for rates effective Apr. 1, 2025).

⁵ Case No. 2025-00149, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (filed May 19, 2025), GCR rate report (for rates effective July 1, 2025).

⁶ See, Case No. 2025-00049, (Ky. PSC Mar. 31, 2025), suspension Order; and Case No. 2025-00149, (Ky. PSC June 30, 2025), suspension Order.

⁷ Case No. 2025-00270, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (filed Aug. 13, 2025), GCR rate report (for rates effective Oct. 1, 2025).

⁸ Natural Energy's Response to Commission Staff's First Request for Information (Staff's First Request) (filed Jan. 15, 2025); and Natural Energy's Response to Commission Staff's Second Request for Information (Staff's Second Request) (filed Feb. 20, 2025).

Further, the utility has the burden to prove the rates are just and reasonable and the Commission may reduce the purchased gas component of the utility's rates, or the rates charged by an affiliated company, to the extent the amount is deemed to be unjust or unreasonable.⁹

Pursuant to 807 KAR 5:001, Section 13(1), "[a]ll material on file with the commission shall be available for examination by the public unless the material is confidential." A request for confidential treatment must establish specific grounds pursuant to KRS 61.878 for classification of that material as confidential.¹⁰ A request for confidential treatment in a case must be made by motion.¹¹ The motion and one copy of the material in paper medium, with only those portions for which confidentiality is sought redacted, shall be served on all parties.¹² However, a copy of the materials containing the material for which confidential treatment is sought shall be filed with the Commission under seal.¹³

Notwithstanding the requirement in 807 KAR 5:001, Section 13(2)(a) that a request for confidential treatment in a case be made pursuant to a motion, a person filing a paper in a case must encrypt or redact the paper so that personal information cannot be read.¹⁴ Personal information includes, among other things, a business name or an

⁹ KRS 278.274(2); KRS 278.274(3)(c); and KRS 278.274(3)(d).

¹⁰ 807 KAR 5:001, Section 13(2)(a)1.; 807 KAR 5:001, Section 13(3)(a)1.

¹¹ 807 KAR 5:001, Section 13(2)(a).

¹² 807 KAR 5:001, Section 13(2)(b).

¹³ 807 KAR 5:001, Section 13(2)(a).

¹⁴ 807 KAR 5:001, Section 4(10)(a).

individual's first and last name in combination with one or more of the following data elements:

1. The digits of a Social Security number or taxpayer identification number;
2. The month and date of an individual's birth;
3. The digits of an account number, credit card number, or debit card number that, in combination with any required security code, access code, or password, would permit access to an account;
- ...
7. The address, phone number, or email address of an individual who is not a party and has not requested to be a party.

BACKGROUND

Natural Energy's Tariff sets forth that customers with a high load factor or high usage may be served by special contract, at the discretion of Natural Energy and with the approval of the Commission.¹⁵ Natural Energy currently holds special contracts with about four high usage customers.¹⁶

Natural Energy entered into a Gas Service Agreement or Special Contract (2018 Agreement) with an Industrial Customer known as [REDACTED]⁷ [REDACTED] or (Contract Customer) and that agreement was approved in Case No. 2018-00164.¹⁸ Natural Energy requested confidential treatment of: the identity of the Contract

¹⁵ Natural Energy's Tariff, PSC KY NO. 1, Original Sheet No. 1; and PSC KY No. 1, 1st Revised Sheet No. 5, Sheet No. 5.

¹⁶ Natural Energy's Response to Staff's Second Request, Item 8.

¹⁷ Natural Energy requested and received confidential treatment pursuant to 807 KAR 5:001, Section 13 for certain information included in the 2018 Agreement, including the identity of the Contract Customer, contract rates, terms and conditions of service, and a map of a proposed project. Such information is therefore redacted from the public version of this Order.

¹⁸ Case No. 2018-00164, *The Filing of a Special Contract by Natural Energy Utility Corporation* (filed May 1, 2018), 2018 Agreement filing.

Customer; the contract rates, terms and conditions of service; a map of a proposed project; and certain other information contained in the 2018 Agreement.¹⁹ The requested items in the 2018 Agreement were granted confidential protection by a Commission issued letter.²⁰ The term limit on the 2018 Agreement is [REDACTED] with an option of a renewal of [REDACTED] unless written notice of termination from either party is delivered.²¹ On September 6, 2018, the Commission issued a final Order in Case No. 2018-00164 granting approval of Natural Energy's 2018 Agreement as filed. The Contract Customer became operational and began procuring natural gas from Natural Energy in February 2019.²²

Natural Energy has previously been permitted to remove both the cost of purchasing gas for special contract customers and the sales to special contract customers from its GCR calculation. For instance, in Case No. 2021-00122²³ and Case No. 2021-00446,²⁴ Natural Energy has reported that its prior GCR report calculations inadvertently included sales to a special contract customer since June 2017. The Commission ultimately found that the special contract customer's sales should be removed from the GCR calculation and that Natural Energy was entitled to recover costs going back for the

¹⁹ Case No. 2018-00164, May 1, 2018, 2018 Agreement filing.

²⁰ TFS 2018-00207 (Ky. PSC filed May 1, 2018). Pursuant to 807 KAR 5:001, Section 13(3)(c), the Commission issued a letter approving Natural Energy's Petition for Confidentiality on June 8, 2018.

²¹ Case No. 2018-00164, May 1, 2018, 2018 Agreement filing.

²² Application (filed Nov. 19, 2024), Answer_-_Question_1.pdf, Item 1a.

²³ Case No. 2021-00122, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (Ky. PSC Aug. 22, 2022), Order.

²⁴ Case No. 2021-00446, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation* (Ky. PSC Dec. 27, 2021), Order.

two years that it failed to recover due to the improper inclusion of the special contract customers' sales in the GCR calculation.²⁵

On May 8, 2024, Natural Energy filed an Addendum (2024 Addendum) to the 2018 Agreement and requested further confidential treatment of the identity of the Contract Customer, the contract rates and terms of the 2024 Addendum.²⁶ [REDACTED]

[REDACTED] Natural Energy explained that the 2018 Agreement was amended before the original contract expiration date due to late payment of invoices.²⁷ Natural Energy agreed to continue service of the Contract Customer under the terms of the 2018 Agreement as amended by the 2024 Addendum.

Under the terms of the 2018 Agreement, Contract Customer was charged [REDACTED]

[REDACTED]

[REDACTED]²⁸

[REDACTED]

²⁵ Case No. 2021-00446, (Ky. PSC Dec. 27, 2021), Order.

²⁶ TFS 2024-00212, Natural Energy Contract Amendment (filed May 8, 2024); the tariff was accepted for filing by the Commission by letter dated June 6, 2024. The effective date of the Commission approved 2024 Addendum is June 7, 2024.

²⁷ Application, Answer_-_Question_1.pdf, Item 1c.

²⁸ TFS 2018-00207, (filed May 1, 2018) 2018 Agreement.

[REDACTED]

[REDACTED] and therefore, the gas purchase costs or sales of the Contract Customer were not included in Natural Energy's GCR calculation.

The 2024 Addendum changes the prior 2018 Agreement charges [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]²⁹ When asked about the Contract Customer and the GCR mechanism, Natural Energy indicated that the 2024 Addendum would have no impact on the GCR rate report and that the Contract Customer who has never been included in the report will still not be included in the future.³⁰ Natural Energy further argued that, "classifying the customer as a tariff customer based only on one provision of the contract, essentially negates the terms of the contract and makes the customer subject to terms of service associated with a tariff customer."³¹

Redactions and Confidential Material It appears that Natural Energy used whiteout to obscure text on white paper, making it difficult to determine in some cases exactly what information was redacted and as well as the propriety of each redaction. Natural Energy also generally provided poor copies of invoices, which made them difficult to read. As noted above, 807 KAR 5:001, Section 13(2), requires papers filed containing personally protected information, in part defined to include the combination of a name and address, be redacted without filing a motion for confidential treatment. Here, Natural

²⁹ TFS 2024-00212, (filed May 8, 2024) Natural Energy Utility Corporation Contract Amendment (filed May 8, 2024).

³⁰ Application, Answer_-_Question_1.pdf, Item 1d.

³¹ Natural Energy's Response to Staff's First Request, Item 2.

Energy redacted both the vendor's name and address on supplier bills.³² Further, in response to a request from Commission Staff for the suppliers' names, Natural Energy, without filing a motion, asserted the information to be confidential.³³

Suspended GCR Rates As noted above, on December 26, 2024, the Commission issued an Order suspending Natural Energy's proposed GCR rate for one day, until January 2, 2025, allowing Natural Energy to implement the GCR rates, subject to refund, provided it submitted appropriate written notice required by KRS 278.190(2). In a response to a request for information, Natural Energy stated it had placed its suspended GCR rates into effect on and after January 2, 2025.³⁴ Furthermore, the proposed Expected Gas Cost (EGC) rate of Natural Energy's suspended GCR rate report filings were used in the calculation methodology of proceeding GCR rate reports filed by Natural Energy.³⁵

Based upon a review of the record, Natural Energy did not provide the Commission with notice in the record of this case of its intent to do so pursuant to KRS 278.190(2) and as directed by the Commission in its December 26, 2024 suspension Order.³⁶ Further,

³² See, Natural Energy's letter dated November 19, 2024, including the 10 pages of attachments, proposing a GCR rate to be effective on January 1, 2025 (GCR Rate Report), supplemental supplier invoices.

³³ Natural Energy's Response to Staff's Second Request, Items 1d and 2f.

³⁴ Natural Energy's Response to Staff's Second Request, Item 9.

³⁵ See, GCR rate report (for rates effective Jan. 1, 2025), Schedule I the Gas Cost Recovery Rate Summary calculation sheet, the EGC is \$3.8050 per Mcf; and see, Case No. 2025-00149, May 19, 2025 GCR rate report (for rates effective Jul. 1, 2025), Schedule IV the Actual Adjustment calculation sheet, the column for "EGC in effect for month" is at \$3.8050 per Mcf. Also, see Case No. 2025-00049, Feb. 26, 2025 GCR rate report (for rates effective Apr. 1, 2025), Schedule I the Gas Cost Recovery Rate Summary calculation sheet, the EGC is \$4.6926 per Mcf; and see Case No. 2025-00270, Aug. 13, 2025 GCR rate report (for rates effective Oct. 1, 2025), Schedule IV the Actual Adjustment calculation sheet, the column for "EGC in effect for month" is at \$4.6926 per Mcf.

³⁶ See, Order to Suspend (Ky. PSC Dec. 26, 2024), ordering paragraphs 2 and 3.

while not directly relevant to this case, similarly, Natural Energy does not appear to have given notice of its intent to place rates into effect in Case Nos. 2025-00049³⁷ and 2025-00149³⁸ following the Commission's issuance of suspension Orders in those proceedings.

However, Natural Energy did file, using the Commission's electronic Tariff Filing System, revised tariff sheets setting out the updated GCR rates suspended in Case Nos. 2024-00369;³⁹ 2025-00049;⁴⁰ and 2025-00149.⁴¹ Specifically, with respect to this case, Natural Energy filed a tariff through the Commission's tariff filing system including the updated GCR rate, indicating an effective date of January 2, 2025, and indicating that the tariff was "by authority of order of the Kentucky Public Service Commission in Case No. 2024-00369 dated December 26, 2024."⁴²

Based on the response from Natural Energy regarding the charge of a Commission suspended rate, the filing of revised tariff sheets referencing the ongoing suspended cases, and the use of suspended EGC in the calculation of the quarterly Actual Adjustment (AA) components, the Commission will investigate this situation further.

³⁷ See, Case No. 2025-00049, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation*. As of the date of service of this Order the last record filed into this case was the Commission's March 31, 2025 suspension Order.

³⁸ See, Case No. 2025-00149, *Electronic Purchased Gas Adjustment Filing of Natural Energy Utility Corporation*. As of the date of service of this Order the last record filed into this case was the Commission's June 30, 2025 suspension Order.

³⁹ TFS 2025-00342, (filed Aug. 4, 2025) Revised Tariff filing of GCR rates for Natural Energy effective Jan. 2, 2025.

⁴⁰ TFS 2025-00343, (filed Aug. 4, 2025) Revised Tariff filing of GCR rates for Natural Energy effective Apr. 2, 2025.

⁴¹ TFS2025-00344, (filed Aug. 4, 2025) Revised Tariff filing of GCR rates for Natural Energy effective Jul. 2, 2025.

⁴² TFS 2025-00342, (filed Aug. 4, 2025) Revised Tariff filing of GCR rates for Natural Energy effective Jan. 2, 2025.

DISCUSSION

The Commission finds [REDACTED] of the Contract Customer should be included in the calculation of Natural Energy's GCR rate mechanism. Natural Energy's assumption that including the Contract Customer in the calculation would negate the other terms of the 2018 Agreement and the 2024 Addendum is unreasonable. [REDACTED]

[REDACTED]

[REDACTED]⁴⁵ Natural Energy properly removed the Contract Customer from the GCR calculation while under the 2018 Agreement as [REDACTED]

However, [REDACTED]
[REDACTED] it is reasonable for the gas costs and sales of the Contract Customer to be included in the GCR calculation. By ensuring the Contract Customer is included in the GCR

⁴³ TFS 2024-00212, Natural Energy's Contract Amendment (filed May 8, 2024).

⁴⁴ Natural Energy's Tariff: PSC KY No. 1, 1st Revised Sheet No. 17; PSC KY No. 1, 1st Revised Sheet No. 18; and PSC KY No. 1, 1st Revised Sheet No. 19.

⁴⁵ See, Case No. 2014-00368, *Valley Gas, Inc. Request For Approval Of A Special Contract With Mago Construction Company And A Deviation From The Gas Cost Adjustment Clause* (Ky. PSC Oct. 28, 2014), final Order. Valley Gas Inc. (Valley Gas) requested to the Commission a deviation from its GCR so as to exclude the cost of a special contract customer's gas supply from recovery through Valley Gas's GCR mechanism. The Commission ordered in that case that the gas purchased cost for the customer would not be included in the GCR when the customer procured gas from a secondary supplier. If the customer purchased gas from Valley Gas directly then those gas costs and sales would be included in the GCR.

mechanism, the GCR will better reflect the actual unit cost of gas of those Natural Energy customers being charged the GCR rate. The Commission finds that beginning with Natural Energy's GCR rate report for rates effective January 1, 2026, Natural Energy should include the Contract Customer's gas purchase costs and sales in the GCR calculation—specifically the expected gas cost (EGC) component, the Actual Adjustment (AA), and the Refund Adjustment, if any, for that filing should all reflect the gas purchase costs and sales for the Contract Customer, meaning the Contract Customer's gas purchases and sales would be reflected in the AA calculation beginning in the period running from July 2025 through September 2025.

Due to the uncertainty of what has been charged to the customers of Natural Energy, the Commission has determined that further information is necessary following the Commission's suspensions of Case Nos. 2024-00369; 2025-00049; and 2025-00149, pertaining to Natural Energy's future GCR rate reports. Therefore, the Commission finds that Natural Energy should file responses to the Request for Information attached herein as Appendix of this Order, when it files its GCR report for rates effective for January 1, 2026, to assist in the timely processing of the case. The Commission further finds that this proceeding, and Case Nos. 2025-00049 and 2025-00149 should be closed, and that any under- or over-recoveries of gas costs that would have been reconciled in these cases, should be reconciled in the GCR rate report filed by Natural Energy for rates effective January 1, 2026.

In regard to the redactions and confidential material discussed above, the Commission finds that Natural Energy should provide legible documents in future filings with any redacted information plainly indicating that redactions have been made. The

white-on-white redaction does not provide the Commission with a clear understanding of what information Natural Energy is attempting to redacted on the record. Furthermore, the Commission directs Natural Energy that, in future cases, supplier names should be provided with the supplier address redacted, if appropriate, so to comply with 807 KAR 5:001, Section 4(10). If Natural Energy considers supplier names to be confidential, the same may be filed confidentially along with a motion for confidential treatment made pursuant to 807 KAR 5:001, Section 13. Failure to do so may adversely affect the timely processing of Natural Energy's GCR reports and may result in an investigation into compliance with applicable law and Commission Orders.

The Commission finds that Natural Energy should thoroughly review Orders issued by the Commission to ensure future compliance. A careful and thorough review of Commission Orders relevant to Natural Energy should minimize any potential errors or failure to comply to Commission directive in its future GCR reports. Failure to minimize errors and a failure to comply with Commission directives in future filings may further adversely affect the timely processing of Natural Energy's GCR reports and may result in a possible investigation.

Additionally, based on the evidence provided in the record, the Commission, on its own motion, hereby finds that following the issuance of this Order an informal conference should be scheduled to take place via video conference link between Natural Energy and Commission Staff. The informal conference should generally address Natural Energy's GCR rate report filings, and the filing requirements for confidential material, to ensure there is a general understanding of the Commission's directive as set forth in this Order. The Commission, acts and speaks only through its written orders and the representations

of Commission Staff members are not binding upon the Commission.⁴⁶ The actions of Commission Staff do not substitute for an Order of this Commission.⁴⁷ Commission Staff will contact participants by electronic mail to provide details for joining the conference by telephone and video link.

IT IS THEREFORE ORDERED that:

1. Natural Energy's GCR rate report for rates effective January 1, 2026, shall include the Contract Customer's gas purchase costs and sales in the GCR calculation.
2. Natural Energy shall provide legible documents in future GCR rate report filings with redacted information plainly identified as discussed herein above.
3. Natural Energy shall provide relevant supplier names in future GCR rate report filings either in the public record, or confidentially pursuant to 807 KAR 5:001, Section 13 upon the filing of a proper motion for confidential treatment.
4. An informal conference shall be scheduled following the issuance of this Order, to take place via video conference link.
5. Commission Staff shall contact participants by electronic mail to provide details for representatives of Natural Energy to join the conference by video link.
6. Natural Energy shall file its responses to the Request for Information included as an Appendix, when it files its GCR report for rates effective for January 1, 2026.

⁴⁶ KRS 278.370; *Union Light, Heat & Power Co. v. Public Serv. Comm'n*, 271 S.W.2d 361, 365 (Ky. App. 1954).

⁴⁷ *Bee's Old Reliable Shows, Inc. v. Kentucky Power Co.*, 334 S.W.2d 765 (Ky. 1960).

7. Any under- or over-recoveries of gas costs that would have otherwise been reconciled in this case, shall be reconciled in the GCR rate report filed by Natural Energy for rates effective January 1, 2026.

8. This case is closed and removed from the Commission's docket.

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PUBLIC SERVICE COMMISSION



Chairman



Commissioner



Commissioner

ATTEST:

 
Executive Director



APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2024-00369 DATED SEP 04 2025

COMMISSION STAFF'S CASE NO. 2024-00369 REQUEST FOR INFORMATION TO NATURAL ENERGY UTILITY CORPORATION

Natural Energy Utility Corporation (Natural Energy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due when it files its next GCR report for rates effective for January 1, 2026. The Commission directs Natural Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085⁴⁸ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

⁴⁸ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Natural Energy shall make timely amendment to any prior response if Natural Energy obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Natural Energy fails or refuses to furnish all or part of the requested information, Natural Energy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Natural Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide all invoices received from gas suppliers, for each month, following the June 2024 period to the most recent reporting period.
2. State the monthly GCR rate that was charged to Natural Energy's customers following the June 2024 period to the most recent reporting period.
3. Provide the contracts for all active customers taking service from Natural Energy under the terms of a special contract.

4. Provide the invoices showing the rates Natural Energy is charging each of its Special Contract customers for each month from the June 2024 period to the most recent reporting period.

5. For each special contract customer, explain if Natural Energy is responsible for purchasing the gas to serve those customers, or whether those customer(s) procure gas from a third party.

6. Explain, in detail, how the cost of gas purchased for the special contract customer(s) is accounted for when calculating the GCR rate, including the gas cost rate assigned to the special contract customer, and explain, in detail, how the sales volumes and the revenue from gas sales to the special contract customer are accounted for when calculating the GCR rate.

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