

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

ELECTRONIC APPLICATION FOR REVISED	)	
QUARTERLY GAS COST RECOVERY	)	CASE NO.
SCHEDULES OF KENTUCKY	)	2023-00067
FRONTIER GAS, LLC	)	

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**APPLICATION FOR REVISED QUARTERLY  
GAS COST RECOVERY SCHEDULES**

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Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”) by and through the undersigned counsel and petitions the Kentucky Public Service Commission (“Commission”) to approve its proposed revision to the schedules it provides for its quarterly Gas Cost Recovery Rate (“GCR”) filings. Kentucky Frontier proposes a revision to the schedules filed showing the details of the input to the gas cost recovery rate in its current tariff to address the gross under recovery reported to the Commission in June 2022. Kentucky Frontier has attempted to address the under recovery multiple times. As grounds for the approval of this addition of detail of its GCR Kentucky Frontier respectfully states as follows:

1. Kentucky Frontier proposes a more detailed calculation of the Balancing Adjustment (BA) that includes an *actual* balance of the account and is not proposing a change to its current tariff. As set forth in Kentucky Frontier’s tariff the GCR formula is:

$$\text{GCR} = \text{Expected Gas Cost (“EGC”)} + \text{Refund Adjustment (“RA”)} + \text{Actual Adjustment (“AA”)} + \text{BA or } \text{GCR} = \text{EGC} + \text{RA} + \text{AA} + \text{BA}$$

Kentucky Frontier is not proposing a change to the gas cost recovery rate specifically defined in tariff sheets 29 and 30 (attached as Exhibit A).

2. Kentucky Frontier proposes to only revise the schedules that Frontier provides to the Commission with its quarterly GCR filings, but not the formula itself. The proposed changes are attached as Exhibit B in pdf format and Exhibit C as an excel spreadsheet; and explained in Schedule I of both. These illustrate what Kentucky Frontier's quarterly GCR filings would look like in the future if approved by the Commission.

3. The current tariff defines the elements of the formula in text form. There is no request to change the definition of the Expected Gas Cost that is defined as follows:

**EGC** - the Expected Gas Cost component, on a dollar per MCF basis, which represents the average expected cost of gas supplies and may include fixed price, forward price and indexed price purchases. The purchases are reduced by any amounts injected into underground storage. The EGC includes withdrawals from underground storage at the average unit cost of working gas. The EGC includes the uncollectible gas costs portion of bad debt. In an effort to mitigate price volatility, the Company may contract with gas suppliers at fixed prices, at locked-in prices for gas to be delivered at future dates (forward price) and at index-based prices. These efforts can include the monthly or periodic layering of forward purchase volumes to help moderate the volatility of gas prices. The Company may consider published futures prices as well as price trends and price expectations at the time such decisions are made. Depending upon the circumstances, this volume can be up to the annual projected system requirements including storage needs.

4. The current tariff defines the Refund Adjustment (RA) as follows:

**RA** - The supplier Refund Adjustment, on a dollar per MCF basis, which reflects refunds received from suppliers during the reporting period, plus interest at the average 90 day commercial paper rate for the calendar quarter. In the event of any large or unusual refunds, the Company may apply to the Public Service Commission for the right to depart from the refund procedure herein set forth.

There is no request to change the definition of the RA. The revised GCR calculation Exhibit B and C, Schedule I, shows the value of the RA at zero. Kentucky Frontier has never had a supplier refund or a non-zero RA.

5. The Actual Adjustment (AA) is defined as follows:

**AA** - The Actual Adjustment, on a dollar per MCF basis, compensates for difference between the previous quarter's expected gas cost and the actual cost of gas during that quarter.

There is no request to change the definition of the AA.

6. The Balancing Adjustment (BA) is defined as follows:

**BA** - The Balancing Adjustment, on a dollar per MCF basis, which compensates for any under or over collections which have occurred as a result of prior adjustments.

There is no request to change the definition of the BA.

7. Kentucky Frontier is proposing that the BA element of the GCR formula be calculated using the actual balance of the gas balancing account. Any BA will be a single adjustment figure and will still add any AA from the last quarter and all previous quarters. This method is simpler and provides more relevant information for the customers, the Commission, and the utility. The proposal is only changing the input to the formula, however it does not change the formula itself and therefore, Kentucky Frontier, does not believe that customer notice pursuant to 807 KAR 5:011, Section 8 is required. Additionally, Kentucky Frontier does not believe that its current tariff should be revised, as the formula listed is still being utilized and adding that the actual balance of the gas balancing account is being used to the tariff is a level of detail for the tariff that would not provide the average customer with a greater understanding of the GCR, however the operation of adding this information to the calculation of the BA will provide the average customer with more information in Kentucky Frontier's quarterly GCR reports filed in the public record. Kentucky Frontier has filed a motion for deviation with this application in the alternative, should the Commission find that customer notice is required, and Kentucky Frontier will comply with any Commission Order.

8. Kentucky Frontier's current tariff contemplates a procedure for petitioning the Commission for a change to the input to its GCR. The tariff states that "In the event of any large or unusual refunds, the Company may apply to the Public Service Commission for the right to depart from the refund procedure herein set forth." Kentucky Frontier asserts that the significant

under recovery documented in the quarterly GCR filings in 2022 and several filings is good cause for a change to the input to the GCR formula. Additionally, Kentucky Frontier's tariff explains how allowed and appropriate adjustments in its calculations regarding volumes for the average expected gas cost shall be described in its quarterly GCR filing, and the proposal herein allows for a more transparent description of the BA in its quarterly GCR filing.

9. The schedules that Kentucky Frontier has been using were spreadsheets given by Commission Staff at the outset of Kentucky Frontier's acquisition of several small gas utilities in Kentucky. In its review of its gas cost under recovery, Kentucky Frontier found that its GCR procedure used in Kentucky has never kept nor presented the *actual* balance of the BA in the public record. Showing the actual balance of the BA will assist in preventing large under-recovery as well as large over-recovery.

10. Kentucky Frontier developed a BA spreadsheet to track the monthly gas costs and recoveries. This spreadsheet is identified as Schedule II and attached as Exhibits B and C. The spreadsheet data begins January 2018, the first month of the combined Kentucky Frontier and Public Gas rates after the 2017 consolidating general rate case. Exhibits B and C include actual results through October 2022 to give an example of the improved information that could be provided and therefore, could be addressed by the function of the GCR to more accurately adjust recovery for purchased gas. The numbers included in Exhibits B and C are illustrative to help explain the basis for the more detailed BA.

10a. Exhibits B and C illustrate that while Public Gas no longer exists and its customers are now branded Kentucky Frontier, the former Public Gas customers are tracked separately in this analysis to show the consequences of excessive Jefferson/EKM charges. Since the large rate increase effective November 2020, former Public Gas

customers have paid back \$1.1 million **less than** Kentucky Frontier paid for the gas to supply the former Public Gas customers. This deficit was (partially) subsidized by all remaining Kentucky Frontier customers, although Kentucky Frontier has inadvertently funded much of this through the deficit created by the standard method of calculating the BA.

11. In November 2018, the Commission ordered Kentucky Frontier to limit gas cost recovery to 5 percent gas losses. This limit on gas losses is not contained in Kentucky Frontier's tariff and therefore, does not require a proposed tariff revision or notice to customers to revise. Kentucky Frontier proposes a reasonable adjustment to the 5 percent limit on losses to 7.5 percent due to the disproportionate penalty the limit places on Kentucky Frontier. Kentucky Frontier followed the original GCR spreadsheets provided by Commission Staff for each quarterly GCR filing. The limited gas losses pre-penalized Frontier for future L&U on future gas purchases. This handicap slowed the response to rising gas index prices and added to a negative BA. In both November 2021 and February 2022, each the first month of new GCR rates, Kentucky Frontier under-recovered \$150-160k in a single month. This is a huge deficit for Kentucky Frontier as a relatively small utility with annual sales under 400k MCF. In each of these months, Kentucky Frontier lost about \$0.40 per MCF on an entire *year* of sales. Since the imposition of the 5 percent loss limit starting November 2018, the total calculated value of "Excess L&U" was substantial.

11a. Exhibits B and C show Kentucky Frontier has under-recovered gas costs by as much as \$700,000. This deficit is significantly more than the return on investment allowed by the Commission. In several quarters with an already-high BA balance, the present GCR calculations imposed a negative AA surcharge, which made this under recovery issue worse.

11b. The Commission imposed limits against Kentucky Frontier passing on the full cost of purchased gas when gas losses are deemed excessive. Lost and unaccounted-for gas or L&U can be an indicator of the condition of a gas system. Kentucky Frontier acknowledges the logic of limiting the effect on consumers, but submits that the limit should be higher, due to the particular circumstances of the Kentucky Frontier systems.

11c. Kentucky Frontier is a conglomeration of a dozen tiny gas utilities in Eastern Kentucky, now with about 5500 customers. Starting in 2008, Kentucky Frontier acquired several gas systems of dubious operation and shaky financial condition, although most had oversight by the Commission. Every system had gas losses over 10 percent. One utility was found to have falsified Federal records on gas losses for 20 years or more, when this system often had losses of 30-50 percent. Several had corroded steel pipe or off-spec PE pipe and bad fusion joints. All systems have benefited from Kentucky Frontier's expertise and consistent, uniform operating practices and plans for improvement.

11d. In Case No. 2011-00443, *Application of Kentucky Frontier Gas, LLC for Approval of Consolidation of and Adjustment of Rates, Approval of AMR Equipment and a Certificate of Convenience and Necessity for Installation of AMR, Pipeline Replacement Program, Revision of Non-Recurring Fees and Revision of Tariffs*, the general rates of the first acquired utilities were consolidated into a single Kentucky Frontier rate structure. In that case, Kentucky Frontier established its Pipeline Replacement Program (PRP) and Automated Meter Program (AMR) to improve systems and reduce gas losses. When the case was finalized in May 2013, Frontier immediately started to replace and upgrade gas measurement, make more extensive leak surveys and replace the leakiest segments of pipeline. In Case No. 2017-00263, *Electronic Application of Kentucky Frontier Gas, LLC*

*for Alternative Rate Adjustment*, the customers of Public Gas were consolidated into Kentucky Frontier general rates and added to the PRP and AMR programs. The PRP surcharge was increased, beginning January 2018. Public Gas added more targets to the metering and pipeline replacement projects.

11e. Through quarterly purchased gas adjustment filings approved by the Commission, Kentucky Frontier passed through the entire cost of purchased gas for about nine years. In Case 2017-00401 for GCR rates effective November 1, 2017, the Commission imposed a new limit on future purchased gas adjustments, reducing purchased gas cost pass-through to no more than 10 percent over Sales volume.

11f. One year later, in Case No. 2018-00334, *Purchased Gas Adjustment Filing of Kentucky Frontier Gas, LLC*, for rates effective November 1, 2018, the Commission further limited Kentucky Frontier's gas cost recovery by reducing the limit on gas losses to 5 percent over sales volume. The Commission's October 30, 2018 Order stated that "Frontier's amended application for rates effective November 1, 2018 returned to using the *standard* 5 percent L&U limit in the calculation of its EGC rate".

11g. This change was not voluntary. Kentucky Frontier's tariff has no such language for a 5 percent limit. This decision was not supported by any actual L&U history or by Kentucky Frontier achieving a new threshold. Moreover, there is no statute or Commission rule that limits gas cost recovery or that defines a "standard" limit to losses of 5 percent, or any such parameter.

11h. Kentucky Frontier is a small gas utility in customer count, compared with the five large local distribution companies ("LDC") in Kentucky. However, Kentucky Frontier has about 5500 customers and is larger than most municipal gas utilities and the

small LDCs. As compared with most other gas utilities in Kentucky, Kentucky Frontier serves extremely rural customers. By far, the largest community is Jackson, Kentucky, with about 500 meters. Most Kentucky Frontier customers live in small rural, unincorporated communities, crossroads and clusters.

11i. Kentucky Frontier operates about 360 miles of pipeline to serve 4900 utility customers (the rest are farm taps). Customer density is about 15 meters per mile of pipe. The four large LDCs and others that serve primarily urban-suburban communities will typically serve 50-60 meters per mile of pipe. With similar vintages and conditions of pipe, with only 25-30 percent customer density, losses on Kentucky Frontier pipelines should be statistically 3-4 times higher than systems in towns, based on customer density.

11j. Kentucky Frontier has no large industrial users to dilute the effects of gas losses. The two largest customers are a regional hospital and a prison, each of which has the load of one typical urban school. There is no significant user of process or industrial heat, so nearly the entire Kentucky Frontier load is heat-sensitive. The summer load gets down near 200 Mcf per day. Any gas loss/leakage/theft of even small volumes can cause 20-30 percent L&U in summer months. When Kentucky Frontier started, the former Belfry Gas was leaking 30-50 Mcf per day. Kentucky Frontier has replaced pipe in the former Belfry Gas system and with other maintenance has largely reduced the amount of L&U in that system. However, Frontier is at a disadvantage compared to larger urban systems in this area. The Kentucky metro systems with industrial customers will move 10-20 times higher gas volume per mile of pipe. The same exact leaking section of pipe could generate 7 percent losses on the Frontier system, but less than ½ percent volumetric loss on a large urban system in Kentucky.



11k. Kentucky Frontier to date has collected and spent about \$500,000 in its AMR program, to refurbish-test-replace meters and add electronic automated meter reading. The meter program will be close to completion in 2023. The PRP surcharge has raised and invested \$1.6M to replace miles of marginal pipeline, to positively odorize all systems to find leaks, and effect several improved technologies to find & fix leaks and unlocatable pipelines. Nearly all Kentucky Frontier pipelines are mapped in the Geographical Information System (“GIS”) database along with many DOT records, to keep better track of operating history. Kentucky Frontier has made steady progress in finding and reducing gas leaks and losses. However, the systems Kentucky Frontier acquired and combined to make the current Kentucky Frontier system were in subpar shape and more work is needed to get the system to a point where Kentucky Frontier could have less than 5 percent L&U. The long rural pipelines, low customer density and low volume usage may make 5 percent losses unachievable.

12. The current calculation using a 5 percent limit pre-penalized gas costs for high L&U led to rates lagging behind rising prices. Instead, the revised Kentucky Frontier GCR schedules will analyze L&U after the fact, and only annually, not monthly or quarterly. This removes the futures handicap, the large seasonal variations in customers and usage patterns, and almost negates the small gap between the meter reading period and the monthly supplier invoice.

13. The BA analysis in Exhibits B and C show an annual L&U calculation for each period ending October 31. This is sometimes known as a Gas Year, starting with the upcoming heating season. Each annual analysis calculates the Excess L&U limit as defined by the Commission; then the Purchase volume that exceeded this limit; and the value of that excess volume, at the average purchase price per Mcf.

13a. The calculation of Excess L&U is differentiated between former Public Gas and other Frontier systems. The former Public Gas system has lower L&U of 2 percent, where the other Kentucky Frontier systems are higher at 9.7 percent since November of 2018. Because of excessive gas cost on Jefferson-EKM, the average gas cost is inflated for all of Kentucky Frontier. Since the high L&U losses are on non-Public-EKM systems, any excess L&U is valued at the much lower non-Public-EKM gas cost.

13b. For comparison with the Commission's specified *standard* 5 percent loss limit: Kentucky Frontier currently has two pipeline suppliers that add 14-15 percent L&U to the cost of their system deliveries to Kentucky Frontier. These charges are neither negotiable by Kentucky Frontier nor subject to the jurisdiction of the Commission.

14. Kentucky Frontier recognizes the intent to protect consumers against wanton gas losses by irresponsible gas utilities. But despite nine years of work and over \$2M investment, several Kentucky Frontier systems still have gas losses in excess of 5 percent L&U. The shortfall in gas cost recovery is a material burden on the utility. Therefore, Kentucky Frontier proposes a reasonable adjustment to limit gas losses in its GCR calculation to 7.5 percent of Sales for good cause shown above to address the significant under recovery documented in 2022 and to address the inequitable result of applying the arbitrary 5 percent limit on losses.

**WHEREFORE**, based on the foregoing, Kentucky Frontier respectfully requests the Commission grant its petition to revise the schedules submitted calculating the current GCR formula, including a more detailed BA and allow a revised 7.5 percent limit of losses. Kentucky Frontier requests that the Commission render its decision by March 31, 2023, in order for Kentucky Frontier to include the revised schedules in its next GCR quarterly filing. Kentucky Frontier is willing to meet with the Commission at a formal conference to explain this revision or meet with

Commission Staff to explain the revision as well. Kentucky Frontier has filed a motion for deviation in the alternative, should the Commission find that any element of this application should require customer notice. Additionally, should the Commission determine that Kentucky Frontier should revise its tariff to include this detail in its GCR formula and include the percentage of limit to losses, Kentucky Frontier will comply with any Commission Order. Finally, Kentucky Frontier has noted the administrative burden the Commission referenced in its January 31, 2023 Order in Case No. 2022-00434, *Electronic Purchase Gas Adjustment Filing of Kentucky Frontier Gas, LLC*, and believes that filing this request for a revision to its schedules as a separate case was the most efficient way of proposing the change because Kentucky Frontier must diligently continue to propose possible solutions to its significant under recovery in order to continue to provide reasonable service to its customers.

Dated this 24<sup>th</sup> day of February, 2023.

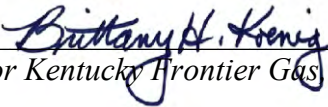
Respectfully submitted,

  
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*Counsel for Kentucky Frontier Gas, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on February 24, 2023; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.

  
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*Counsel for Kentucky Frontier Gas LLC*

Kentucky Frontier Gas LLC

For Entire Service Area

PSC No. 3

Sheet Original No. 29

Canceling

PSC No. 2 (entire)

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**RULES & REGULATIONS**

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**V. PURCHASED GAS COST ADJUSTMENT (Non-farm tap rates)**

**A. PROCEDURE**

The Company shall file a Quarterly Report with the Commission which shall contain an updated Gas Cost Recovery Rate (GCR) and shall be filed at least thirty (30) days prior to the beginning of each calendar quarter. The GCR shall become effective for billing with the final meter readings of the first billing cycle of each calendar quarter.

The gas cost recovery rates are comprised of:

**EGC** - the Expected Gas Cost component, on a dollar per MCF basis, which represents the average expected cost of gas supplies and may include fixed price, forward price and indexed price purchases. The purchases are reduced by any amounts injected into underground storage. The EGC includes withdrawals from underground storage at the average unit cost of working gas. The EGC includes the uncollectible gas costs portion of bad debt. In an effort to mitigate price volatility, the Company may contract with gas suppliers at fixed prices, at locked-in prices for gas to be delivered at future dates (forward price) and at index-based prices. These efforts can include the monthly or periodic layering of forward purchase volumes to help moderate the volatility of gas prices. The Company may consider published futures prices as well as price trends and price expectations at the time such decisions are made. Depending upon the circumstances, this volume can be up to the annual projected system requirements including storage needs.

**RA** - The supplier Refund Adjustment, on a dollar per MCF basis, which reflects refunds received from suppliers during the reporting period, plus interest at the average 90 day commercial paper rate for the calendar quarter. In the event of any large or unusual refunds, the Company may apply to the Public Service Commission for the right to depart from the refund procedure herein set forth.

**AA** - The Actual Adjustment, on a dollar per MCF basis, compensates for difference between the previous quarter's expected gas cost and the actual cost of gas during that quarter.

**DATE OF ISSUE**            June 21, 2013  
**DATE EFFECTIVE**        June 21, 2013  
**ISSUED BY**                Robert Oxford, Member-Manager

Issued by Authority of an Order of the  
Public Service Commission of KY  
in Case No. 2011-00443 dated June 21, 2013

<b>KENTUCKY PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN EXECUTIVE DIRECTOR</b>
TARIFF BRANCH

EFFECTIVE <b>6/21/2013</b>
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Kentucky Frontier Gas LLC

For Entire Service Area

PSC No. 3

Sheet Original No. 30

Canceling

PSC No. 2 (entire)

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**RULES & REGULATIONS**

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**BA** - The Balancing Adjustment, on a dollar per MCF basis, which compensates for any under or over collections which have occurred as a result of prior adjustments.

**B. BILLING CALCULATION**

The gas cost recovery rate to be applied to bills of customers shall equal the sum of the following:

$$\text{GCR} = \text{EGC} + \text{RA} + \text{AA} + \text{BA}$$

**C. DEFINITIONS**

“Average Expected Cost” means the cost of gas supplies, for injections/withdrawals into storage and the uncollectible gas costs portion of bad debt. Cost of gas supplies include associated transportation and storage charges, and propane which results from the application of suppliers' rates currently in effect, or reasonably expected to be in effect during the calendar quarter, on purchased volumes during the twelve month period ending with the reporting period to which the GCR will apply, divided by the corresponding sales volume. Where the calculations require the use of volumes used during a given period, and those volumes did not exist for a particular source for the entire period, or the Company expects the volumes to change substantially, the Company may make appropriate adjustments in its calculations. Any adjustments of this type shall be described in the quarterly Gas Cost Recovery Report.

“GCR” means the quarterly updated gas cost recovery rate applicable to the monthly consumption of customers (sum of the expected gas cost component plus the supplier refund adjustment plus the actual adjustment plus the balancing adjustment; i.e.,  $\text{GCR} = \text{EGC} + \text{RA} + \text{AA} + \text{BA}$ ).

“Calendar Quarters” means each of the four three-month periods of (1) August, September and October; (2) November, December and January; (3) February, March and April; and (4) May, June and July.

“Reporting Period” means the three (3) month accounting period that ended approximately sixty (60) days prior to the filing date of the updated gas recovery rates; i.e., the calendar quarter preceding that during which the most recent Quarterly Report was filed.

**DATE OF ISSUE**            June 21, 2013  
**DATE EFFECTIVE**        June 21, 2013  
**ISSUED BY**                Robert Oxford, Member-Manager

Issued by Authority of an Order of the  
Public Service Commission of KY  
in Case No. 2011-00443 dated June 21, 2013

<b>KENTUCKY</b> <b>PUBLIC SERVICE COMMISSION</b>
<b>JEFF R. DEROUEN</b> EXECUTIVE DIRECTOR
TARIFF BRANCH

EFFECTIVE <b>6/21/2013</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

**SCHEDULE I**  
**Kentucky Frontier Gas, LLC - unified utility**  
**RATE DETERMINATION**

GAS SALES VOLUMES, last 12 months	375,000	MCF	
<b><u>EXPECTED GAS COST</u></b>	<i>from Schedule II</i>		
GAS SALES VOLUMES, next period:	140,500	MCF	<i>(calculated on pg. 2)</i>
GAS PURCHASE COSTS, next period:	\$ 1,277,286		<i>(calculated on pg. 2)</i>
EXPECTED GAS COST of sales	\$ 9.09		<i>per MCF of sales, next period</i>
<b><u>BALANCE ADJUSTMENT</u></b>	<i>from Schedule III</i>		
CUMULATIVE Over/(Under) RECOVERY	\$ (677,795)		<i>Gas Bal Acct, at Oct 31, 2022</i>
UNDER-Recovered Gas Cost to amortize	\$ (677,795)		
BALANCE ADJUSTMENT	\$ 1.81		<i>Balance to amortize 12 mos</i>
<b><u>GAS COST RECOVERY RATES:</u></b>	<i>from Tariff</i> <b>GCR = EGC + RA + AA + BA</b> <i>RA = 0, AA included in BA</i>		
EXPECTED GAS COST per MCF of sales	\$ 9.09		<i>EGC</i>
PLUS (Under) / MINUS (Over) -Recovery Bal Adjustmt	\$ 1.81		<i>Balance Adjmt</i>
TOTAL Gas Cost Recovery RATE	\$ 10.90		<i>per MCF of sales, next period</i>

**SCHEDULE I**  
**Kentucky Frontier Gas, LLC - unified utility**  
**RATE DETERMINATION**

**DETERMINATION OF RATES by Class of Customer:**

	<i>Gross sales components, \$ per MCF</i>			
	<b>Non Gas</b>	<b>Gas</b>	<b>Adjustment</b>	<b>Total</b>
<b>Residential &amp; Commercial</b>				
proposed	4.22	9.09	1.81	\$ <b>15.12</b> per MCF
current	4.22	11.50	0.66	\$ 16.39
change	-	(2.41)	1.15	\$ (1.27)
<b>Large Commercial</b>				
proposed	3.45	9.09	1.81	\$ <b>14.35</b> per MCF
current	3.45	11.50	0.66	\$ 15.61
change	-	(2.41)	1.15	\$ (1.27)

**EXPECTED GAS COSTS:**

PROJECTED NEXT QUARTER *Based on historical data and current contracts*

<b>Month</b>	<b>Gas Sales MCF</b>	<b>Sched II EGC \$ / MCF</b>	<b>Purchased Gas Cost</b>
Feb-23	63,500	<b>\$9.09</b>	\$ 577,279
Mar-23	48,500	\$9.09	\$ 440,914
Apr-23	28,500	\$9.09	\$ 259,094
<b>TOTALS</b>	<b><u>140,500</u></b>		<b><u>\$ 1,277,286</u></b>

*EGC Expected Gas Cost* **\$9.09** per MCF of Sales  
*Monthly MCF volumes are based on average Sales for last 5 years.*



**SCHEDULE I**  
**Kentucky Frontier Gas, LLC - unified utility**  
**RATE DETERMINATION**

**EFFECT OF RATE CHANGE on Average Residential customer:**

<b>Annualized Effect</b>	<b>Gas Use MCF</b>	<b>Gas Use % of Yr</b>	<b>Gas Charge</b>	<b>New Rate Total Bill</b>	<b>Old Rate Total Bill</b>	<b>Change \$</b>	<b>Change %</b>
<b>Jan</b>	10.5	21.0%	\$ 158.73	\$ 173.73	\$ 187.04	\$ (13.31)	-7.1%
<b>Feb</b>	9.2	18.5%	139.64	154.64	166.35	(11.71)	-7.0%
<b>Mar</b>	6.7	13.5%	102.01	117.01	125.56	(8.55)	-6.8%
<b>Apr</b>	3.6	7.2%	54.23	69.23	73.78	(4.55)	-6.2%
<b>May</b>	1.6	3.3%	24.84	39.84	41.92	(2.08)	-5.0%
<b>Jun</b>	0.7	1.4%	10.37	25.37	26.24	(0.87)	-3.3%
<b>Jul</b>	0.5	1.0%	7.69	22.69	23.34	(0.64)	-2.8%
<b>Aug</b>	0.5	1.0%	7.85	22.85	23.51	(0.66)	-2.8%
<b>Sep</b>	0.6	1.2%	8.81	23.81	24.55	(0.74)	-3.0%
<b>Oct</b>	1.9	3.8%	29.09	44.09	46.53	(2.44)	-5.2%
<b>Nov</b>	5.6	11.3%	85.35	100.35	107.51	(7.16)	-6.7%
<b>Dec</b>	8.4	16.9%	127.39	142.39	153.07	(10.68)	-7.0%
<b>Totals</b>	<b>50.0</b>	<b>100.0%</b>	<b>\$ 756.00</b>	<b>\$ 936.00</b>	<b>\$ 999.39</b>	<b>\$ (63.39)</b>	<b>-6.3%</b>

\$ 15.12 rate per MCF \$ 16.39 rate per MCF  
\$ (1.27) change

*^Average Residential profile*

**SCHEDULE II**

**Kentucky Frontier Gas, LLC - unified utility  
EXPECTED GAS COST - EGC**

**Allocation of gas costs by supplier**

MCF Purchases for 12 months ended:

		October 31, 2022			
			(4)	(5)	(4) x (5)
Supplier	Dth	Btu Factor	Mcf	Rate	Cost
Columbia (Goble Roberts, Peoples)		N/A	10,483	\$ 10.98	\$ 115,146
Cumberland Valley (Auxier)		1.1000	105,183	\$ 5.98	\$ 629,369
Cumberland Valley (Sigma) incl \$1.25 DLR transpt		1.1000	3,050	\$ 7.23	\$ 22,062
Diversified Energy (39-E,181-S)		1.0000	49	\$ 6.87	\$ 337
* HI-Energy		1.0031	8,987	\$ 4.26	\$ 38,313
** HTC (Sigma) includes \$1.25/Mcf DLR trans		1.0758	5,574	\$ 5.55	\$ 30,954
Jefferson (Sigma) rate incl \$1.25/Mcf DLR transpt		1.1184	620	\$ 14.02	\$ 8,693
Magnum Drilling, Inc.		N/A	3,559	\$ 10.50	\$ 37,370
Nytis (Auxier)		1.0962	6,581	\$ 5.40	\$ 35,565
Nytis (Sigma) incl \$1.25/Mcf DLR transpt		1.0962	4,624	\$ 5.57	\$ 25,771
Quality (Belfry)		1.1999	39,268	\$ 6.04	\$ 237,002
** Slone Energy		1.0714	5,395	\$ 4.23	\$ 22,797
Southern Energy (EKU-MLG-Price)		1.2066	61,330	\$ 7.34	\$ 449,925
Southern Energy (Sigma) incl \$1.25/Mcf DLR trans		1.2066	44,719	\$ 8.59	\$ 383,963
** Spirit		1.1178	2,664	\$ 4.47	\$ 11,911
** Tackett		1.0745	0	\$ 4.30	\$ -
<i>Total Frontier less Public Gas</i>	74%		302,086		\$ 2,049,178
<i>former Public Gas</i>					
Jefferson-EKM (incl Daysboro)	26%	1.1184	105,880	\$ 12.77	\$1,352,217
<b>Totals</b>			<b>407,966</b>	<b>\$ 8.34</b>	<b>\$ 3,401,396</b>
<hr/>					
Line loss 12 months ended:		<u>Oct-22</u>	based on purchase of		407,966 MCF
and sales of		<u>374,155</u>	MCF	<u>8.3%</u>	L&U
					<u>Amount</u>
Total Expected Cost of Purchases (6)					<b>\$ 3,401,396</b>
/ Mcf Purchases (4)					Mcf 407,966
= Average Expected Cost per MCF Purchased					\$/Mcf \$ 8.34
EGC per MCF Sold					\$/Mcf <b>\$ 9.09</b>
					<i>to Schedule I</i>

<b><i>Adjusted cost basis by Supplier</i></b>	<i>per DTh</i>	
NYMEx	\$ <b>5.37</b>	<i>wtd ave futures price for next quarter</i>
TCO Appal Basis FofMo	\$ (0.44)	<i>5 year average winter differential</i>
forecast TCO FOM	\$ <b>4.93</b>	<i>per ave basis off NYMEx</i>
Columbia of KY	\$ 10.98	<i>tariffed utility rate</i>
Diversified	\$ 6.87	<i>TCO + 14% K WV L&amp;U-fuel; PL comm-demand</i>
Jefferson EKM (Public)	\$ 11.42	<i>TCO + \$5.75 +15% L&amp;U</i>
CVR Cumberland Valley (Auxier)	\$ 5.44	<i>NYMEx + TCoPL fuel-demand-comm, marketg</i>
Hi Energy contract	\$ 4.25	<i>greater of 80% TCO or \$4.25 /Dth</i>
HTC, Spirit/Tackett contract	\$ 4.00	<i>greater of 80% TCO or \$4.00 /Dth</i>
Magnum Drilling contract	\$ 10.50	<i>fixed contract for Blaine</i>
Nytis (Auxier)	\$ 4.93	<i>TCO</i>
Nytis (Sigma)	\$ 3.94	<i>80% TCO</i>
Slone Egy contract	\$ 3.94	<i>greater of 80% TCO or \$4.00 /Dth</i>
Southern Energy	\$ 6.08	<i>TCO + \$1.15 marketing</i>
Quality (Belfry)	\$ 5.03	<i>TCO + \$0.10</i>
DLR (Sigma)	\$ 1.25	<i>transpt frm 8 suppliers to Auxr-BTU-Sigma</i>

Month	System	Purch Mcf	Purch \$	Purch \$/Mcf	Sales Mcf	L&U	Gas Sales	O/U Recov Cost	Cum O/U Recov GBA Balance	Expected	AA + BA	Gas Cost	GCA Rate
										Gas Cost \$/MCF	Adjst	Reconcil'n	\$/Mcf
Jan-18	KFG	65,406	\$291,131	\$ 4.451	62,719	4%	\$342,672	\$51,541		\$ 5.464	\$ -	\$ -	\$ 5.464
	PGC	29,404	\$196,402	\$ 6.679	27,814	5%	\$151,965	(\$44,437)					
	<b>Total</b>	<b>94,810</b>	<b>\$487,533</b>	<b>\$ 5.142</b>	<b>90,533</b>	<b>5%</b>		<b>\$7,103</b>	<b>\$7,103</b>				
Feb-18	KFG	35,323	\$179,044	\$ 5.069	38,306	-8%	\$206,205	\$27,161		\$ 5.383	\$ -	\$ -	\$ 5.383
	PGC	15,049	\$107,182	\$ 7.122	13,430	11%	\$72,295	(\$34,887)					
	<b>Total</b>	<b>50,372</b>	<b>\$286,226</b>	<b>\$ 5.682</b>	<b>51,736</b>	<b>-3%</b>		<b>(\$7,726)</b>	<b>(\$623)</b>				
Mar-18	KFG	41,090	\$167,635	\$ 4.080	35,545	13%	\$191,342	\$23,707					
	PGC	16,557	\$104,730	\$ 6.325	15,864	4%	\$85,397	(\$19,333)					
	<b>Total</b>	<b>57,647</b>	<b>\$272,365</b>	<b>\$ 4.725</b>	<b>51,409</b>	<b>11%</b>		<b>\$4,375</b>	<b>\$3,752</b>				
Apr-18	KFG	25,637	\$97,922	\$ 3.820	20,974	18%	\$112,905	\$14,983					
	PGC	7,345	\$47,233	\$ 6.431	2,025	72%	\$10,901	(\$36,332)					
	<b>Total</b>	<b>32,982</b>	<b>\$145,155</b>	<b>\$ 4.401</b>	<b>22,999</b>	<b>30%</b>		<b>(\$21,349)</b>	<b>(\$17,597)</b>				
May-18	KFG	10,288	\$41,743	\$ 4.057	12,480	-21%	\$67,537	\$25,794		\$ 5.383	\$ -	\$ 0.029	\$ 5.412
	PGC	3,940	\$25,821	\$ 6.554	7,620	-93%	\$39,241	\$13,420		\$ 5.383	\$ -	\$ (0.233)	\$ 5.150
	<b>Total</b>	<b>14,228</b>	<b>\$67,564</b>	<b>\$ 4.749</b>	<b>20,100</b>	<b>-41%</b>		<b>\$39,213</b>	<b>\$21,616</b>				
Jun-18	KFG	8,163	\$27,226	\$ 3.335	6,373	22%	\$34,488	\$7,262		\$ 5.383	\$ -	\$ 0.029	\$ 5.412
	PGC	1,827	\$12,055	\$ 6.598	1,664	9%	\$8,569	(\$3,486)		\$ 5.383	\$ -	\$ (0.233)	\$ 5.150
	<b>Total</b>	<b>9,990</b>	<b>\$39,281</b>	<b>\$ 3.932</b>	<b>8,037</b>	<b>20%</b>		<b>\$3,776</b>	<b>\$25,393</b>				
Jul-18	KFG	8,324	\$30,123	\$ 3.619	5,553	33%	\$30,051	(\$72)		\$ 5.383	\$ -	\$ 0.029	\$ 5.412
	PGC	1,610	\$10,911	\$ 6.777	1,481	8%	\$7,627	(\$3,284)		\$ 5.383	\$ -	\$ (0.233)	\$ 5.150
	<b>Total</b>	<b>9,934</b>	<b>\$41,034</b>	<b>\$ 4.131</b>	<b>7,034</b>	<b>29%</b>		<b>(\$3,357)</b>	<b>\$22,036</b>				
Aug-18	KFG	9,466	\$29,433	\$ 3.109	7,314	23%	\$42,160	\$12,727		\$ 5.655	\$ 0.081	\$ 0.029	\$ 5.764
	PGC	1,595	\$10,463	\$ 6.560	1,404	12%	\$7,725	(\$2,738)		\$ 5.655	\$ 0.081	\$ (0.233)	\$ 5.502
	<b>Total</b>	<b>11,061</b>	<b>\$39,896</b>	<b>\$ 3.607</b>	<b>8,718</b>	<b>21%</b>		<b>\$9,989</b>	<b>\$32,025</b>				
Sep-18	KFG	9,582	\$36,682	\$ 3.828	7,643	20%	\$43,049	\$6,367		\$ 5.523	\$ 0.081	\$ 0.029	\$ 5.633
	PGC	1,545	\$10,228	\$ 6.620	1,541	0%	\$8,276	(\$1,952)		\$ 5.523	\$ 0.081	\$ (0.233)	\$ 5.371
	<b>Total</b>	<b>11,127</b>	<b>\$46,910</b>	<b>\$ 4.216</b>	<b>9,184</b>	<b>17%</b>		<b>\$4,415</b>	<b>\$36,441</b>				
Oct-18	KFG	18,112	\$85,714	\$ 4.732	14,016	23%	\$78,945	(\$6,769)		\$ 5.523	\$ 0.081	\$ 0.029	\$ 5.633
	PGC	4,976	\$33,269	\$ 6.686	4,429	11%	\$23,786	(\$9,483)		\$ 5.523	\$ 0.081	\$ (0.233)	\$ 5.371
	<b>Total</b>	<b>23,088</b>	<b>\$118,983</b>	<b>\$ 5.153</b>	<b>18,445</b>	<b>20%</b>		<b>(\$16,251)</b>	<b>\$20,189</b>				
<b>Totals</b>		<b>231,391</b>	<b>\$ 986,653</b>	<b>\$ 4.26</b>	<b>210,923</b>	<b>8.8%</b>	<b>\$ 1,149,354</b>						
	PGC	<b>83,848</b>	<b>\$ 558,294</b>	<b>\$ 6.66</b>	<b>77,272</b>	<b>7.8%</b>	<b>\$ 415,782</b>						
	<b>Total</b>	<b>315,239</b>	<b>\$ 1,544,947</b>	<b>\$ 4.90</b>	<b>288,195</b>	<b>8.6%</b>							

Month	System	Purch Mcf	Purch \$	Purch \$/Mcf	Sales Mcf	L&U	Gas Sales	O/U Recov Cost	Cum O/U Recov GBA Balance	Expected	AA + BA	Gas Cost	GCA Rate
										Gas Cost \$/MCF	Adjst	Reconci'l'n	\$/Mcf
Nov-18	KFG	39,068	\$169,340	\$ 4.334	34,861	11%	\$193,538	\$24,198		\$ 5.634	\$ (0.111)	\$ 0.029	\$ 5.552
	PGC	13,908	\$96,435	\$ 6.934	14,377	-3%	\$76,051	(\$20,384)		\$ 5.634	\$ (0.111)	\$ (0.233)	\$ 5.290
	<b>Total</b>	<b>52,976</b>	<b>\$265,775</b>	<b>\$ 5.017</b>	<b>49,238</b>	<b>7%</b>		<b>\$3,814</b>	<b>\$24,003</b>				
Dec-18	KFG	44,532	\$286,615	\$ 6.436	46,176	-4%	\$257,330	(\$29,285)		\$ 5.655	\$ (0.111)	\$ 0.029	\$ 5.573
	PGC	18,479	\$160,784	\$ 8.701	18,390	0%	\$97,667	(\$63,117)		\$ 5.655	\$ (0.111)	\$ (0.233)	\$ 5.311
	<b>Total</b>	<b>63,011</b>	<b>\$447,399</b>	<b>\$ 7.100</b>	<b>64,566</b>	<b>-2%</b>		<b>(\$92,402)</b>	<b>(\$68,399)</b>				
Jan-19	KFG	47,794	\$288,627	\$ 6.039	45,251	5%	\$252,175	(\$36,452)		\$ 5.655	\$ (0.111)	\$ 0.029	\$ 5.573
	PGC	23,558	\$175,203	\$ 7.437	21,066	11%	\$111,879	(\$63,324)		\$ 5.655	\$ (0.111)	\$ (0.233)	\$ 5.311
	<b>Total</b>	<b>71,352</b>	<b>\$463,830</b>	<b>\$ 6.501</b>	<b>66,317</b>	<b>7%</b>		<b>(\$99,776)</b>	<b>(\$168,174)</b>				
Feb-19	KFG	39,964	\$173,388	\$ 4.339	39,075	2%	\$220,907	\$47,519		\$ 5.825	\$ (0.200)	\$ 0.029	\$ 5.653
	PGC	17,208	\$115,276	\$ 6.699	17,934	-4%	\$96,691	(\$18,585)		\$ 5.825	\$ (0.200)	\$ (0.233)	\$ 5.392
	<b>Total</b>	<b>57,172</b>	<b>\$288,664</b>	<b>\$ 5.049</b>	<b>57,009</b>	<b>0%</b>		<b>\$28,934</b>	<b>(\$139,241)</b>				
Mar-19	KFG	40,449	\$178,913	\$ 4.423	38,116	6%	\$215,485	\$36,572		\$ 5.825	\$ (0.200)	\$ 0.029	\$ 5.653
	PGC	16,307	\$107,600	\$ 6.598	16,181	1%	\$87,240	(\$20,360)		\$ 5.825	\$ (0.200)	\$ (0.233)	\$ 5.392
	<b>Total</b>	<b>56,756</b>	<b>\$286,513</b>	<b>\$ 5.048</b>	<b>54,297</b>	<b>4%</b>		<b>\$16,212</b>	<b>(\$123,029)</b>				
Apr-19	KFG	17,950	\$63,002	\$ 3.510	18,674	-4%	\$105,572	\$42,570		\$ 5.825	\$ (0.200)	\$ 0.029	\$ 5.653
	PGC	6,652	\$42,627	\$ 6.408	6,669	0%	\$35,956	(\$6,671)		\$ 5.825	\$ (0.200)	\$ (0.233)	\$ 5.392
	<b>Total</b>	<b>24,602</b>	<b>\$105,629</b>	<b>\$ 4.294</b>	<b>25,343</b>	<b>-3%</b>		<b>\$35,899</b>	<b>(\$87,130)</b>				
May-19	KFG	2,126	\$13,196	\$ 6.207	2,450	-15%	\$13,126	(\$70)		\$ 5.069	\$ 0.288		\$ 5.358
	PGC	847	\$8,620	\$ 10.177	849	0%	\$4,549	(\$4,071)					
	<b>Total</b>	<b>2,973</b>	<b>\$21,816</b>	<b>\$ 7.338</b>	<b>3,299</b>	<b>-11%</b>		<b>(\$4,141)</b>	<b>(\$91,271)</b>				
Jun-19	KFG	8,506	\$35,088	\$ 4.125	7,004	18%	\$37,525	\$2,437					
	PGC	1,727	\$10,758	\$ 6.229	1,638	5%	\$8,776	(\$1,982)					
	<b>Total</b>	<b>10,233</b>	<b>\$45,846</b>	<b>\$ 4.480</b>	<b>8,642</b>	<b>16%</b>		<b>\$454</b>	<b>(\$90,817)</b>				
Jul-19	KFG	6,826	\$37,418	\$ 5.482	5,697	17%	\$30,522	(\$6,896)					
	PGC	1,473	\$8,632	\$ 5.860	1,461	1%	\$7,827	(\$805)					
	<b>Total</b>	<b>8,299</b>	<b>\$46,050</b>	<b>\$ 5.549</b>	<b>7,158</b>	<b>14%</b>		<b>(\$7,700)</b>	<b>(\$98,517)</b>				
Aug-19	KFG	7,093	\$29,508	\$ 4.160	6,150	13%	\$30,245	\$737		\$ 5.060	\$ (0.142)		\$ 4.918
	PGC	1,575	\$9,019	\$ 5.726	1,463	7%	\$7,195	(\$1,824)					
	<b>Total</b>	<b>8,668</b>	<b>\$38,527</b>	<b>\$ 4.445</b>	<b>7,613</b>	<b>12%</b>		<b>(\$1,087)</b>	<b>(\$99,604)</b>				
Sep-19	KFG	7,082	\$25,580	\$ 3.612	5,890	17%	\$28,966	\$3,386					
	PGC	1,031	\$5,927	\$ 5.749	1,397	-35%	\$6,870	\$943					
	<b>Total</b>	<b>8,113</b>	<b>\$31,507</b>	<b>\$ 3.884</b>	<b>7,287</b>	<b>10%</b>		<b>\$4,330</b>	<b>(\$95,275)</b>				
Oct-19	KFG	13,453	\$47,333	\$ 3.518	10,901	19%	\$53,610	\$6,277					
	PGC	4,168	\$23,214	\$ 5.570	3,912	6%	\$19,239	(\$3,975)					
	<b>Total</b>	<b>17,621</b>	<b>\$70,547</b>	<b>\$ 4.004</b>	<b>14,813</b>	<b>16%</b>		<b>\$2,302</b>	<b>(\$92,973)</b>	<b>Sales/limtr</b>	<b>Excess L&amp;U</b>		
<b>L&amp;U Limit calcs</b>	<b>274,843</b>	<b>\$ 1,348,008</b>	<b>\$ 4.90</b>	<b>260,245</b>	<b>5.3%</b>	<b>\$ 988,133</b>	<b>\$ (65,957)</b>	<b>Excess L&amp;U</b>					
PGC	<b>106,933</b>	<b>\$ 764,095</b>	<b>\$ 7.15</b>	<b>105,337</b>	<b>1.5%</b>	<b>\$ 386,222</b>			281,346	(6,503)			
<b>Total</b>	<b>381,776</b>	<b>\$ 2,112,103</b>	<b>\$ 5.53</b>	<b>365,582</b>	<b>4.2%</b>	<b>\$ -</b>		<b>(\$92,973)</b>	395,224	(13,448)	<i>no credit carryover</i>		

Month	System	Purch	Purch	Purch	Sales Mcf	L&U	Gas Sales	O/U Recov	Cum O/U	Expected	AA + BA	Gas Cost	GCA Rate
		Mcf	Mcf	\$/Mcf				Cost	Recov GBA				
Nov-19	KFG	37,517	\$124,098	\$ 3.308	29,031	23%	\$139,433	\$15,335		\$ 4.766	\$ 0.037		\$ 4.803
	PGC	14,918	\$91,294	\$ 6.120	13,274	11%	\$63,754	(\$27,540)					
	<b>Total</b>	<b>52,435</b>	<b>\$215,392</b>	<b>\$ 4.108</b>	<b>42,305</b>	<b>19%</b>		<b>(\$12,205)</b>	<b>(\$105,178)</b>				
Dec-19	KFG	42,985	\$136,704	\$ 3.180	43,235	-1%	\$207,653	\$70,949					
	PGC	18,941	\$108,664	\$ 5.737	19,248	-2%	\$92,446	(\$16,218)					
	<b>Total</b>	<b>61,926</b>	<b>\$245,368</b>	<b>\$ 3.962</b>	<b>62,483</b>	<b>-1%</b>		<b>\$54,732</b>	<b>(\$50,447)</b>				
Jan-20	KFG	45,464	\$162,157	\$ 3.567	42,378	7%	\$203,537	\$41,380					
	PGC	20,236	\$114,738	\$ 5.670	19,700	3%	\$94,617	(\$20,121)					
	<b>Total</b>	<b>65,700</b>	<b>\$276,895</b>	<b>\$ 4.215</b>	<b>62,078</b>	<b>6%</b>		<b>\$21,259</b>	<b>(\$29,187)</b>				
Feb-20	KFG	43,784	\$124,549	\$ 2.845	38,041	13%	\$171,972	\$47,423		\$ 4.486	\$ 0.034		\$ 4.521
	PGC	18,969	\$101,404	\$ 5.346	18,892	0%	\$85,405	(\$15,999)					
	<b>Total</b>	<b>62,753</b>	<b>\$225,953</b>	<b>\$ 3.601</b>	<b>56,933</b>	<b>9%</b>		<b>\$31,424</b>	<b>\$2,237</b>				
Mar-20	KFG	28,890	\$95,845	\$ 3.318	28,863	0%	\$130,481	\$34,636					
	PGC	14,733	\$79,088	\$ 5.368	13,405	9%	\$60,600	(\$18,488)					
	<b>Total</b>	<b>43,623</b>	<b>\$174,933</b>	<b>\$ 4.010</b>	<b>42,268</b>	<b>3%</b>		<b>\$16,148</b>	<b>\$18,385</b>				
Apr-20	KFG	23,069	\$62,790	\$ 2.722	19,246	17%	\$87,005	\$24,215					
	PGC	8,076	\$41,456	\$ 5.133	8,609	-7%	\$38,919	(\$2,537)					
	<b>Total</b>	<b>31,145</b>	<b>\$104,246</b>	<b>\$ 3.347</b>	<b>27,855</b>	<b>11%</b>		<b>\$21,678</b>	<b>\$40,063</b>				
May-20	KFG	16,487	\$47,074	\$ 2.855	14,604	11%	\$66,020	\$18,946					
	PGC	5,041	\$27,286	\$ 5.413	5,167	-2%	\$23,358	(\$3,928)					
	Daysboro	161	\$871	\$ 5.410	122	24%	\$634	(\$237)					
	<b>Total</b>	<b>21,689</b>	<b>\$75,231</b>	<b>\$ 3.469</b>	<b>19,893</b>	<b>8%</b>		<b>\$14,782</b>	<b>\$54,845</b>				
Jun-20	KFG	9,003	\$30,400	\$ 3.377	6,931	23%	\$31,333	\$933					
	PGC	2,540	\$13,408	\$ 5.279	1,880	26%	\$8,499	(\$4,909)					
	Daysboro	35	\$185	\$ 5.286	11	69%	\$57	(\$128)					
	<b>Total</b>	<b>11,578</b>	<b>43,993</b>	<b>\$ 3.800</b>	<b>8,822</b>	<b>24%</b>		<b>(4,104)</b>	<b>\$50,741</b>				
Jul-20	KFG	7,026	\$20,947	\$ 2.981	5,519	21%	\$18,411	(\$2,536)		\$ 3.999	\$ (0.663)		\$ 3.336
	PGC	2,398	\$12,095	\$ 5.044	1,511	37%	\$5,041	(\$7,054)					
	<b>Total</b>	<b>9,424</b>	<b>\$33,042</b>	<b>\$ 3.506</b>	<b>7,030</b>	<b>25%</b>		<b>(\$9,590)</b>	<b>\$41,151</b>				
Aug-20	KFG	7,241	\$23,874	\$ 3.297	5,117	29%	\$17,419	(\$6,455)		\$ 3.920	\$ (0.516)		\$ 3.404
	PGC	1,664	\$9,015	\$ 5.418	1,457	12%	\$4,960	(\$4,055)					
	<b>Total</b>	<b>8,905</b>	<b>\$32,889</b>	<b>\$ 3.693</b>	<b>6,574</b>	<b>26%</b>		<b>(\$10,510)</b>	<b>\$30,641</b>				
Sep-20	KFG	8,567	\$24,277	\$ 2.834	6,310	26%	\$21,481	(\$2,796)					
	PGC	1,831	\$10,136	\$ 5.536	1,625	11%	\$5,532	(\$4,604)					
	<b>Total</b>	<b>10,398</b>	<b>\$34,413</b>	<b>\$ 3.310</b>	<b>7,935</b>	<b>24%</b>		<b>(\$7,401)</b>	<b>\$23,241</b>				
Oct-20	KFG	14,527	\$40,113	\$ 2.761	11,437	21%	\$38,934	(\$1,179)					
	PGC	4,013	\$19,972	\$ 4.977	3,855	4%	\$13,123	(\$6,849)					
	<b>Total</b>	<b>18,540</b>	<b>\$60,085</b>	<b>\$ 3.241</b>	<b>15,292</b>	<b>18%</b>		<b>(\$8,028)</b>	<b>\$15,213</b>				
<b>L&amp;U Limit calcs</b>		<b>284,560</b>	\$ 892,828	\$ 3.14	<b>250,712</b>	<b>11.9%</b>	\$ 1,133,680	\$ 29,813	<b>Excess L&amp;U</b>	<b>271,040</b>	<b>13,520</b>		
PGC		<b>113,556</b>	\$ 629,612	\$ 5.54	<b>108,756</b>	<b>4.2%</b>	\$ 496,945			<b>117,574</b>	<b>(4,018)</b>		
<b>Total</b>		<b>398,116</b>	\$ 1,522,440	\$ 3.82	<b>359,468</b>	<b>9.7%</b>	\$ 692	\$ 29,813	<b>\$45,026</b>	<b>388,614</b>	<b>9,502</b>		



Month	System	Purch	Purch	Purch	Sales Mcf	L&U	Gas Sales	O/U Recov	Cum O/U	Expected	AA + BA	Gas Cost	GCA Rate
		Mcf	Mcf	\$/Mcf				Cost	Recov GBA				
Nov-20	KFG	29,545	\$105,289	\$ 3.564	20,509	31%	\$102,481	(\$2,808)		\$ 5.442	\$ (0.445)		\$ 4.997
	PGC	9,674	\$86,553	\$ 8.947	8,590	11%	\$42,923	(\$43,630)					
	<b>Total</b>	<b>39,219</b>	<b>\$191,842</b>	<b>\$ 4.892</b>	<b>29,099</b>	<b>26%</b>		<b>(\$46,437)</b>	<b>(\$1,411)</b>				
Dec-20	KFG	48,493	\$169,717	\$ 3.500	44,603	8%	\$222,877	\$53,160					
	PGC	22,609	\$197,225	\$ 8.723	22,622	0%	\$113,040	(\$84,185)					
	<b>Total</b>	<b>71,102</b>	<b>\$366,942</b>	<b>\$ 5.161</b>	<b>67,225</b>	<b>5%</b>		<b>(\$31,025)</b>	<b>(\$32,437)</b>				
Jan-21	KFG	52,694	\$179,379	\$ 3.404	49,939	5%	\$249,540	\$70,161					
	PGC	22,378	\$194,959	\$ 8.712	22,055	1%	\$110,207	(\$84,752)					
	<b>Total</b>	<b>75,072</b>	<b>\$374,338</b>	<b>\$ 4.986</b>	<b>71,994</b>	<b>4%</b>		<b>(\$14,591)</b>	<b>(\$47,028)</b>				
Feb-21	KFG	51,356	\$211,230	\$ 4.113	51,733	-1%	\$254,154	\$42,924		\$ 5.309	\$ (0.396)		\$ 4.913
	PGC	27,523	\$252,711	\$ 9.182	25,666	7%	\$126,094	(\$126,617)					
	<b>Total</b>	<b>78,879</b>	<b>\$463,941</b>	<b>\$ 5.882</b>	<b>77,399</b>	<b>2%</b>		<b>(\$83,693)</b>	<b>(\$130,721)</b>				
Mar-21	KFG	31,995	\$120,767	\$ 3.775	31,563	1%	\$155,063	\$34,296					
	PGC	13,893	\$128,340	\$ 9.238	13,572	2%	\$66,675	(\$61,665)					
	<b>Total</b>	<b>45,888</b>	<b>\$249,107</b>	<b>\$ 5.429</b>	<b>45,135</b>	<b>2%</b>		<b>(\$27,370)</b>	<b>(\$158,091)</b>				
Apr-21	KFG	23,097	\$72,299	\$ 3.130	22,735	2%	\$111,693	\$39,394					
	PGC	9,247	\$95,076	\$ 10.282	8,986	3%	\$44,146	(\$50,930)					
	<b>Total</b>	<b>32,344</b>	<b>\$167,375</b>	<b>\$ 5.175</b>	<b>31,721</b>	<b>2%</b>		<b>(\$11,536)</b>	<b>(\$169,627)</b>				
May-21	KFG	14,410	\$63,361	\$ 4.397	10,473	27%	\$56,657	(\$6,704)		\$ 5.654	\$ (0.244)		\$ 5.410
	PGC	3,360	\$34,193	\$ 10.176	3,263	3%	\$17,652	(\$16,541)					
	<b>Total</b>	<b>17,770</b>	<b>\$97,554</b>	<b>\$ 5.490</b>	<b>13,736</b>	<b>23%</b>		<b>(\$23,245)</b>	<b>(\$192,872)</b>				
Jun-21	KFG	8,491	\$39,510	\$ 4.653	7,577	11%	\$40,987	\$1,477					
	PGC	2,400	\$24,661	\$ 10.275	1,927	20%	\$10,423	(\$14,238)					
	<b>Total</b>	<b>10,891</b>	<b>\$64,171</b>	<b>\$ 5.892</b>	<b>9,503</b>	<b>13%</b>		<b>(\$12,761)</b>	<b>(\$205,633)</b>				
Jul-21	KFG	6,629	\$43,249	\$ 6.524	5,433	18%	\$29,388	(\$13,861)					
	PGC	2,126	\$23,127	\$ 10.878	1,404	34%	\$7,595	(\$15,532)					
	<b>Total</b>	<b>8,755</b>	<b>\$66,376</b>	<b>\$ 7.582</b>	<b>6,837</b>	<b>22%</b>		<b>(\$29,393)</b>	<b>(\$235,025)</b>				
Aug-21	KFG	6,096	\$46,911	\$ 7.696	5,445	11%	\$37,500	(\$9,411)		\$ 6.672	\$ 0.215		\$ 6.887
	PGC	1,761	\$19,591	\$ 11.125	1,300	26%	\$8,955	(\$10,636)					
	<b>Total</b>	<b>7,857</b>	<b>\$66,502</b>	<b>\$ 8.465</b>	<b>6,746</b>	<b>14%</b>		<b>(\$20,047)</b>	<b>(\$255,072)</b>				
Sep-21	KFG	7,794	\$36,623	\$ 4.699	6,279	19%	\$43,242	\$6,619					
	PGC	2,065	\$24,112	\$ 11.677	1,565	24%	\$10,778	(\$13,334)					
	<b>Total</b>	<b>9,859</b>	<b>\$60,735</b>	<b>\$ 6.161</b>	<b>7,844</b>	<b>20%</b>		<b>(\$6,716)</b>	<b>(\$261,788)</b>				
Oct-21	KFG	12,478	\$103,658	\$ 8.307	8,492	32%	\$58,483	(\$45,175)					
	PGC	3,127	\$41,142	\$ 13.157	2,409	23%	\$16,590	(\$24,552)					
	<b>Total</b>	<b>15,605</b>	<b>\$144,800</b>	<b>\$ 9.279</b>	<b>10,901</b>	<b>30%</b>		<b>(\$69,727)</b>	<b>(\$331,515)</b>	<b>Sales/limtr</b>	<b>Excess L&amp;U</b>		
<b>L&amp;U Limit calcs</b>		<b>293,077</b>	\$ 1,191,993	\$ 4.07	<b>264,781</b>	9.7%	\$ 1,362,065	\$ 18,059	<b>Excess L&amp;U</b>	286,250	6,828		
PGC		<b>120,163</b>	\$ 1,121,690	\$ 9.33	<b>113,359</b>	5.7%	\$ 575,078			122,550	(2,387)		
<b>Total</b>		<b>413,240</b>	\$ 2,313,683	\$ 5.60	<b>378,140</b>	8.5%	\$ 1,162,888	\$ 18,059	<b>(\$313,456)</b>	408,800	4,440		

Month	System	Purch	Purch	Purch \$/Mcf	Sales Mcf	L&U	Gas Sales	O/U Recov	Cum O/U	Expected Gas Cost \$/MCF	AA + BA Adjst	Gas Cost Reconci'l'n	GCA Rate \$/Mcf
		Mcf						Cost	Recov GBA Balance				
Nov-21	KFG	36,248	\$277,809	\$ 7.664	28,082	23%	\$240,393	(\$37,415)		\$ 8.338	\$ 0.223		\$ 8.560
	PGC	14,788	\$208,825	\$ 14.121	11,273	24%	\$96,501	(\$112,324)					
	<b>Total</b>	<b>51,036</b>	<b>\$486,634</b>	<b>\$ 9.535</b>	<b>39,355</b>	<b>23%</b>		<b>(\$149,739)</b>	<b>(\$463,195)</b>				
Dec-21	KFG	36,233	\$267,227	\$ 7.375	36,613	-1%	\$313,422	\$46,195					
	PGC	14,143	\$188,557	\$ 13.332	16,395	-16%	\$140,348	(\$48,209)					
	<b>Total</b>	<b>50,376</b>	<b>\$455,784</b>	<b>\$ 9.048</b>	<b>53,008</b>	<b>-5%</b>		<b>(\$2,014)</b>	<b>(\$465,209)</b>				
Jan-22	KFG	59,512	\$301,604	\$ 5.068	48,801	18%	\$417,756	\$116,152					
	PGC	22,438	\$255,305	\$ 11.378	22,579	-1%	\$193,285	(\$62,020)					
	<b>Total</b>	<b>81,950</b>	<b>\$556,909</b>	<b>\$ 6.796</b>	<b>71,380</b>	<b>13%</b>		<b>\$54,133</b>	<b>(\$411,076)</b>				
Feb-22	KFG	50,129	\$403,246	\$ 8.044	47,902	4%	\$336,004	(\$67,242)		\$ 6.713	\$ 0.302		\$ 7.014
	PGC	16,910	\$241,973	\$ 14.309	21,543	-27%	\$151,111	(\$90,862)					
	<b>Total</b>	<b>67,039</b>	<b>\$645,219</b>	<b>\$ 9.624</b>	<b>69,445</b>	<b>-4%</b>		<b>(\$158,104)</b>	<b>(\$569,180)</b>				
Mar-22	KFG	35,761	\$182,096	\$ 5.092	32,920	8%	\$230,914	\$48,818					
	PGC	12,923	\$161,126	\$ 12.468	15,106	-17%	\$105,960	(\$55,166)					
	<b>Total</b>	<b>48,684</b>	<b>\$343,222</b>	<b>\$ 7.050</b>	<b>48,026</b>	<b>1%</b>		<b>(\$6,349)</b>	<b>(\$575,529)</b>				
Apr-22	KFG	24,496	\$119,497	\$ 4.878	21,173	14%	\$148,516	\$29,019					
	PGC	8,382	\$102,511	\$ 12.230	8,472	-1%	\$59,426	(\$43,085)					
	<b>Total</b>	<b>32,878</b>	<b>\$222,008</b>	<b>\$ 6.752</b>	<b>29,645</b>	<b>10%</b>		<b>(\$14,066)</b>	<b>(\$589,595)</b>				
May-22	KFG	10,850	\$95,036	\$ 8.759	9,515	12%	\$79,314	(\$15,722)		\$ 8.075	\$ 0.261		\$ 8.336
	PGC	2,573	\$37,756	\$ 14.674	2,427	6%	\$20,231	(\$17,525)					
	<b>Total</b>	<b>13,423</b>	<b>\$132,792</b>	<b>\$ 9.893</b>	<b>11,942</b>	<b>11%</b>		<b>(\$33,247)</b>	<b>(\$622,842)</b>				
Jun-22	KFG	7,482	\$65,032	\$ 8.691	6,459	14%	\$53,840	(\$11,192)					
	PGC	2,117	\$35,203	\$ 16.629	1,673	21%	\$13,946	(\$21,257)					
	<b>Total</b>	<b>9,599</b>	<b>\$100,235</b>	<b>\$ 10.442</b>	<b>8,132</b>	<b>15%</b>		<b>(\$32,449)</b>	<b>(\$655,291)</b>				
Jul-22	KFG	6,836	\$49,484	\$ 7.239	4,801	30%	\$40,020	(\$9,464)					
	PGC	1,549	\$21,055	\$ 13.593	1,376	11%	\$11,470	(\$9,585)					
	<b>Total</b>	<b>8,385</b>	<b>\$70,539</b>	<b>\$ 8.413</b>	<b>6,177</b>	<b>26%</b>		<b>(\$19,049)</b>	<b>(\$674,340)</b>				
Aug-22	KFG	7,163	\$66,750	\$ 9.319	5,528	23%	\$56,051	(\$10,699)		\$ 9.596	\$ 0.544		\$ 10.140
	PGC	1,415	\$23,042	\$ 16.284	1,344	5%	\$13,627	(\$9,415)					
	<b>Total</b>	<b>8,578</b>	<b>\$89,792</b>	<b>\$ 10.468</b>	<b>6,872</b>	<b>20%</b>		<b>(\$20,114)</b>	<b>(\$694,454)</b>				
Sep-22	KFG	7,938	\$73,377	\$ 9.244	6,132	23%	\$62,175	(\$11,201)					
	PGC	1,833	\$30,224	\$ 16.489	1,520	17%	\$15,412	(\$14,812)					
	<b>Total</b>	<b>9,771</b>	<b>\$103,601</b>	<b>\$ 10.603</b>	<b>7,652</b>	<b>22%</b>		<b>(\$26,013)</b>	<b>(\$720,468)</b>				
Oct-22	KFG	19,438	\$123,468	\$ 6.352	16,518	15%	\$167,484	\$44,016					
	PGC	6,809	\$85,493	\$ 12.556	6,003	12%	\$60,867	(\$24,626)					
	<b>Total</b>	<b>26,247</b>	<b>\$208,961</b>	<b>\$ 7.961</b>	<b>22,521</b>	<b>14%</b>		<b>\$19,391</b>	<b>(\$701,077)</b>	<b>Sales/limtr</b>	<b>Excess L&amp;U</b>		
<b>L&amp;U Limit calcs</b>		<b>302,086</b>	\$ 2,024,625	\$ 6.70	<b>264,444</b>	12.5%	\$ 2,145,890	\$ 23,282	<b>Excess L&amp;U</b>	285,885	16,200		
PGC		<b>105,880</b>	\$ 1,391,070	\$ 13.14	<b>109,711</b>	-3.6%	\$ 882,184			118,606	(12,726)		
<b>Total</b>		<b>407,966</b>	\$ 3,415,695	\$ 8.37	<b>374,155</b>	8.3%	\$ 1,780,265	\$ 23,282	<b>(\$677,795)</b>	404,492	3,474		