COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS ENERGY CORPORATION FOR TO ESTABLISH PRP RIDER RATES FOR THE TWELVE MONTH PERIOD BEGINNING OCTOBER 1, 2024	))))	CASE NO. 2024-00226

O R D E R

On July 31, 2024, Atmos Energy Corporation (Atmos) filed an application and tariff to revise its Pipeline Replacement Program (PRP) rates, for the 12-month period beginning October 1, 2024, based on a forecasted test period ending September 30, 2025. Additionally, Atmos requested a waiver from the existing $30 million cap on annual PRP investments set by Commission Order in Case No. 2023-00231[1] and originally set forth in Case No. 2017-00349.[2] On September 27, 2024, the Commission suspended the rates for one day, October 2, 2024, to ensure the orderly investigation of Atmos's application and proposed tariff. Pursuant to KRS 278.190(2), Atmos filed written notice to the Commission of its intention to place the suspended rates into effect on and after October 2, 2024, subject to refund, pending the final Order in this matter.[3] Atmos's previous annual PRP rider rates were approved by the Commission in Case No. 2023-

[1] Case No. 2023-00231, *Electronic Application of Atmos Energy Corporation for PRP Rider Rates Beginning October 1, 2023* (Ky. PSC Sept. 29, 2023), Order at 16.

[2] Case No. 2017-00349, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates and Tariff Modifications* (Ky. PSC May 3, 2018), Order at 42. The original cap on annual PRP investments set by the Commission was to be $28 million in a historical 12-month period.

[3] Notice of Intent to Place Rates into Effect (filed Sept. 30, 2024).

00231.[4] Atmos responded to a round of discovery from Commission Staff. There are no intervenors in this case. This matter now stands submitted for a decision.

LEGAL STANDARD

KRS 278.030(1) states that "[e]very utility may demand, collect and receive fair, just and reasonable rates" for utility service. Pursuant to KRS 278.509, the Commission may allow a utility to recover costs for investment in natural gas pipeline replacement programs that are not recovered in existing rates through a rider if the costs are fair, just and reasonable. The burden of proof to show that an increased rate or charge is just and reasonable shall be upon the utility.[5]

FINDINGS AND DISCUSSION

Revenue Requirement

Net Operating Loss Deferred Tax Assets – In Case No. 2021-00214, Atmos's most recently completed rate case, in which its PRP rate was rolled into base rates and reset to zero, the witness for the Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), argued that Atmos's net operating loss position was reversing in the forecasted test period, so it was no longer reasonable to assume that the PRP rider will generate incremental deferred tax assets from net operating loss carryforwards (NOL ADIT) to completely offset incremental deferred tax liabilities (ADIT liability) arising from its accelerated tax expensing of pipeline

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[4] Case No. 2023-00231, Sept. 29, 2023 Order.

[5] KRS 278.190(3).

replacement projects.[6] The Commission agreed, in part, with the Attorney General's position and stated:

> [C]onsistent with the Commission's determination above that the generation and utilization of NOL ADIT included in rate base for Kentucky should be based on Kentucky operations, the PRP calculation should only reflect an incremental increase in NOL ADIT if Atmos Kentucky is able to establish that its Kentucky operations and its PRP spend actually generated NOL ADIT during the relevant period. The Commission will not accept the imputation of NOL ADIT where none was generated by Kentucky operations in the PRP period, because it would be inconsistent with ratemaking principles and federal normalization rules.[7]

In Atmos's next two PRP cases following that Order, the Commission found that Atmos's method for projecting NOL ADIT did not provide an estimate that was reasonably connected to the actual NOL ADIT that would be generated.[8] The Commission determined that Atmos's method imputed the existence of NOL ADIT in the PRP program year by comparing a significant portion of the ADIT liability that will arise in the program year from Kentucky operations to tax expense on a small fraction of the taxable income from Kentucky operations.[9] The Commission further found that Atmos failed to establish that the NOL ADIT was or would be generated from its Kentucky operations during the relevant PRP program years. The Commission concluded that Atmos failed to establish that its Kentucky operations were in a net operating loss position in the relevant periods,

[6] Case No. 2021-00214, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates* (Ky. PSC May 19, 2022), Order at 61.

[7] Case No. 2021-00214, May 19, 2022 Order at 62.

[8] Case No. 2022-00222, *Electronic Application of Atmos Energy Corporation to Establish PRP Rider Rates for the Twelve Month Period Beginning October 1, 2022* (Ky. PSC May 25, 2023), Order at 7 and Case No. 2023-00231, Sept. 29, 2023 Order at 6.

[9] Case No. 2022-00222, May 25, 2023 Order at 7 and Case No. 2023-00231, Sept. 29, 2023 Order at 6.

and therefore, that its accelerated tax expensing of PRP investments could not be used to offset tax expense.[10] However, because the amounts were de minimis, and thus, excluding it did not merit a potential normalization violation, the Commission offset the ADIT reflected in Atmos's account FXA02—which consisted of deferred tax liabilities arising from accelerated tax depreciation—by a corresponding amount in NOL ADIT.[11]

In its initial filing in this case, Atmos did not impute NOL ADIT as it had in previous cases. Rather, Atmos only imputed NOL ADIT for amounts associated with deferred tax liabilities recorded in FXA02, consistent with the amounts of NOL ADIT the Commission included in the past two PRP cases.[12] Specifically, Atmos assumed that none of the ADIT liability recorded or projected to be recorded in FXA02 in Atmos's 2023, 2024, and 2025 fiscal years was or will be able to offset tax expense through the end of fiscal year 2025, and therefore, Atmos assumed that NOL ADIT was generated for the full balance of that ADIT liability through the end of fiscal year 2025.[13] This resulted in NOL ADIT in the amount of $916,405 being included in rate base, including $584,380 in cumulative NOL ADIT being included for alleged net operating losses in fiscal years 2023 and 2024 and $332,025 being included for the prorated effect of NOL ADIT allegedly generated in fiscal year 2025.[14]

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[10] Case No. 2022-00222, May 25, 2023 Order at 10 and Case No. 2023-00231, Sept. 29, 2023 Order at 6.

[11] Case No. 2022-00222, May 25, 2023 Order at 12 and Case No. 2023-00231, Sept. 29, 2023 Order at 6.

[12] Direct Testimony of Joel J. Multer (Multer Direct Testimony), at 2.

[13] Application, Exhibit F.

[14] See Application, Exhibit F (showing the calculation of the Net ADIT used to offset rate base after the ADIT liabilities were offset by the NOL ADIT and showing the calculation of the NOL ADIT at the end of each fiscal year).

However, in response to discovery conducted in this case, Atmos presented evidence indicating that its Kentucky operations were not in a net operating loss position in either fiscal year (FY) 2023 or FY 2024.[15] While there may be issues with Atmos's methodology,[16] the Commission is unable to find that Atmos was in a net operating loss position or that NOL ADIT was generated in FY 2023 or FY 2024 when the only evidence produced by Atmos as to its actual operating position in those years indicates that it was not in a net operating loss position. Therefore, no NOL ADIT would have been generated in those fiscal years. Thus, the Commission finds that $584,380 in NOL ADIT should be removed from Atmos's revenue requirement and rate calculation, which would increase the ADIT offset in Line Number 12 of Exhibit B of Atmos's revenue model by $(584,380) and would decrease the PRP revenue requirement by $50,872.[17]

Further, while the Commission is not adjusting the NOL ADIT that Atmos calculated for FY 2025, except to the extent that other changes in rate base affect NOL ADIT in the forecasted period, the Commission notes that Atmos has the burden to establish that NOL ADIT will be generated from Kentucky operations as well as the PRP investments. The Commission may adjust NOL ADIT allegedly generated in FY 2025 or

[15] Atmos's Response to Commission Staff's First Request for Information (Atmos's Response to Staff's First Request) (filed Nov. 22, 2024), Item 1, Attachment 1.

[16] There are no other parties to this case, so no objections to the methodology were raised in this case, but a similar methodology was used in Atmos's ongoing rate case, Case No. 2024-00276, and the Attorney General raised some concerns about that methodology. It is not necessary to address those concerns in this case, because even assuming the accuracy of the methodology used by Atmos, it indicates that Atmos's Kentucky operations were not in a net operating loss position in FY2023 or FY 2024.

[17] Reducing the net change to rate base by $584,380 reduces the return component by $54,364 and increases the pre-tax interest synchronization adjustment by $3,492. These adjustments net to a reduction of $50,872.

future years of the PRP if Atmos fails to provide sufficient evidence that NOL ADIT is generated from Kentucky operations and the PRP investments in those years.

Proposed PRP Projects – In Case No. 2009-00354, the Commission first approved a PRP rider for Atmos's accelerated replacement of 250 miles of bare steel pipe and services at an estimated cost of $124 million over 15 years.[18] Atmos subsequently discovered an additional 100 miles of bare steel pipe in its system and, in Case No. 2017-00308, sought to substantially increase its PRP spending.[19] The Commission approved the new PRP rider rates, but found that the significant cost increase warranted a more detailed review of Atmos's PRP, which it conducted in Atmos's then-pending rate case, Case No. 2017-00349.[20] The Commission ultimately limited Atmos's annual PRP investment to $28 million and extended by two years the original 15-year time period for Atmos to complete the replacement of bare steel pipe.[21] Later, in Atmos's PRP Rider Case No. 2023-00231, the cap was increased to $30 million on a prospective basis beginning with Atmos's FY 2025 PRP filing.[22]

In Case No. 2021-00214, Atmos's most recently completed rate case, the Commission found that inclusion in the PRP of future Aldyl-A pipeline replacements will be determined on a case-by-case basis and any PRP applications including Aldyl-A

[18] Case No. 2009-00354, *Application of Atmos Energy Corporation for an Adjustment of Rates* (Ky. PSC May 28, 2010); *See also* Case No. 2017-00349, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates and Tariff Modifications* (Ky. PSC May 3, 2019), Order at 37.

[19] Case No. 2017-00308, *Electronic Application of Atmos Energy Corporation for PRP Rider Rates* (Ky. PSC Oct. 27, 2017), Order.

[20] Case No. 2017-00349, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates and Tariff Modifications* (Ky. PSC May 3, 2019), Order.

[21] Case No. 2017-00349, May 3, 2019 Order at 41.

[22] Case No. 2023-00231, Sept. 29, 2023 Order at 16 and Nov. 3, 2023 Order at 6–7.

projects should, at minimum, provide safety justifications for such projects.[23] In Case No. 2023-00231, the Commission noted the importance of Atmos's Distribution Integrity Management Plan (DIMP) in determining whether an Aldyl-A project should be included in Atmos's PRP, and indicated that the such inclusion should be justified by the DIMP or specific operational circumstances that justify replacement of the Aldyl-A segment ahead of higher ranked bare steel or Aldyl-A segments.[24]

Atmos did not request to include any projects with the primary purpose of replacing Aldyl-A pipeline in its current application,[25] and therefore, did not attempt to justify those projects based on its DIMP. However, Atmos requested a waiver of the $30 million cap on annual PRP investments currently in effect.[26] Atmos stated that it did not believe that the current cap of $30 million will achieve the 2027 timeline of bare steel replacement. Atmos argued that factors such as the coronavirus pandemic, inflation, and supply chain issues throughout the 7-year timeline have resulted in project costs well above the estimates in the original PRP proposal.[27]

Atmos proposed that the Commission include the proposed bare steel project costs in their entirety in order to meet the expected 2027 timeline rather than limit recovery to the $30 million cap.[28] Atmos also stated that the 2027 timeline is impracticable

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[23] Case No. 2021-00214, May 19, 2022 Order at 60.

[24] Case No. 2023-00231, Sept. 29, 2023 Order at 18

[25] Direct Testimony of Ryan Austin (Austin Direct Testimony) at 5–6; s*ee also* Application, Exhibit K-3 at unnumbered page 2. One 2025 project, "PRP.2737.Rosemont Ave," includes the replacement of Aldyl-A; however, it is predominantly a bare steel replacement project.

[26] Application at unnumbered page 4.

[27] Austin Direct Testimony at 4.

[28] Austin Direct Testimony at 5.

regardless of budget due to construction delays caused by the investment cap in prior years and estimated that annual investment of $48 million would be needed to replace all bare steel pipe in its system by 2028.[29] Atmos included a total of $32,975,427 in additions related to bare steel projects for FY 2025 in the PRP.[30]

In addition to its request to remove the current PRP cap in this case, Atmos has proposed modifications to its PRP Tariff and related tariffs, including a request to remove or increase caps to PRP expenditures and limits on Aldyl-A, in a separate general base rate case before the Commission.[31] Those changes have been opposed by the Attorney General.[32] Further, while changes to the cap have been made in a previous PRP case, the process contemplated by the PRP Tariff, consistent with Commission regulations identifying how proposed rate changes should be filed, envisioned the Commission reviewing and entering an order with respect to a defined mechanism, not addressing proposed changes to the mechanism itself. Thus, the Commission finds that addressing Atmos's proposed changes in this case would not be reasonable or consistent with due process given that the same proposed changes are properly before the Commission in an application for a general rate case adjustment filed pursuant to 807 KAR 5:001, Section 16, and have been contested by the Attorney General.

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[29] Atmos's Response to Staff's First Request, Item 6.

[30] Application, PRP Model, Exhibit C.

[31] Case No. 2024-00276, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates; Approval of Tariff Revisions; and Other General Relief* (filed Sept. 27, 2024), Application at 6–7.

[32] Case No. 2024-00276, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates; Approval of Tariff Revisions; and Other General Relief* (filed Jan. 27, 2025), Amended Direct Testimony of Attorney General witness Lane Kollen, at 33-35.

While changing the PRP Tariff to allow for additional recovery through the PRP Tariff could be seen as reasonable, the Commission notes that maintaining the current PRP Tariff, at least in the near term while the issue is addressed more thoroughly in the base rate case, is also reasonable. The reasonableness is in part, for the reasons discussed in the cases above,[33] but also because allowing recovery through a pipeline replacement rider is discretionary and does not prevent a utility from ultimately seeking recovery for plant additions through base rates.

Since Atmos included over $30 million in projects for 2025 in its revenue requirement calculation in this matter in anticipation of the Commission granting its request, it is necessary for the Commission to make an adjustment to the revenue requirement to reflect the rejection of Atmos's proposed change to the mechanism in this case. Specifically, to reduce the FY 2025 additions to $30 million, the additions, retirements, and cost should be reduced by 9.92 percent for each month.[34] The Commission notes that this decrease resulting from enforcement of the $30 million cap reduces the revenue requirement by $142,334.

<u>Capital Structure</u> – Atmos is proposing the same capital structure in this proceeding as was approved by the Commission in its previous annual PRP rider application in Case No. 2023-00231.[35] The Commission finds that this capital structure is consistent with the PRP Tariff and should be approved.

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[33] *See* Case No. 2021-00214, May 19, 2022 Order and Case No. 2023-00231, Sept. 29, 2023 Order.

[34] 32,975,427 – 30,000,000 = 2,975,427 / 32,975,427 = 9.92%.

[35] Application at 5.

Return On Equity – Atmos calculated its PRP revenue requirement based on a 9.45 percent return on equity (ROE) as it was authorized to do in Case No. 2022-00222.[36] In Case No. 2020-00229, the Commission ordered Atmos to amend its PRP Tariff to include language that the overall rate of return would be established in the annual PRP rate application.[37] The Commission further ordered Atmos to file adequate ROE testimony supporting its proposed ROE for its annual PRP Rider application.[38] In compliance, Atmos filed a proposed ROE and supporting ROE testimony in Case No. 2022-00222.[39] The Commission, in that proceeding, found that an ROE of 9.55 percent for Atmos's base rates and an ROE of 9.45 percent for its PRP Rider to be fair, just and reasonable.[40] The Commission further found that the costs associated with the expert testimony required to propose an ROE for its PRP Rider on an annual basis to be more costly than the revenue requirement effect of changing the ROE annually.[41] Thus, the Commission indicated that it would be reasonable in Atmos's next annual PRP filing to use the PRP ROE of 9.45 percent approved in the proceeding, and that should Atmos rely on the PRP ROE of 9.45 percent then it may do so, without filing ROE testimony.[42] Atmos complied and the ROE of 9.45 percent was approved by the Commission in Case

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[36] Case No. 2022-00222, *Electronic Application of Atmos Energy Corporation to Establish PRP Rider Rates for the Twelve Month Period Beginning October 1, 2022* (Ky. PSC May 25, 2023), Order at 24.

[37] Case No. 2020-00229, Sept. 30, 2020 Order at 9-10.

[38] Case No. 2020-00229, Sept. 30, 2020 Order at 8.

[39] Case No. 2022-00222, July 29, 2022, Application, Exhibit B; and Direct Testimony of Dylan W. D'Ascendis at 4.

[40] Case No. 2022-00222, May 25, 2023, Order at 24-25; and See footnote 92.

[41] Case No. 2022-00222, May 25, 2023 Order at 25; and See footnote 97.

[42] Case No. 2022-00222, May 25, 2023 Order at 25.

No. 2023-00231.[43] The Commission finds that Atmos's use of that ROE in this case is reasonable and should be approved.

Atmos's current PRP Rider Tariff, as modified in Case No. 2020-00209, sets out that Atmos, in the calculation of the PRP Rider revenue requirement amount, must establish the overall rate of return and ROE in the annual PRP rate application.[44] The Commission granted an exception to the Tariff requirements in this proceeding and in Case No. 2023-00231 that allowed Atmos to use the previous approved ROE of 9.45 percent, should it wish to do so.[45] Given that Atmos is currently before the Commission in a general base rate case in Case No. 2024-00276, in which a new ROE is being proposed, the Commission finds that the PRP ROE of 9.45 percent as originally approved in Case No. 2022-00222, may no longer be reasonable in Atmos's next PRP annual Application. Therefore, the Commission finds that Atmos's PRP Rider Tariff should be modified to allow Atmos the ability to use the rate of return, including ROE, as established in its last general rate case unless otherwise ordered by the Commission to propose a new ROE with adequate testimony to support its proposed ROE for its next annual PRP Rider application.

With the adjustments discussed above, the Commission finds that Atmos's PRP net rate base is $67,457,442 and its PRP revenue requirement is $7,741,241 as shown in Appendix A.

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[43] Case No. 2023-00231, Sept. 29, 2023 Order at 2.

[44] PSC KY No. 2, Fourth Revised Sheet No. 38; and Case No. 2020-00229, Sept. 30, 2020 Order at 9-10.

[45] Case No. 2022-00222, May 25, 2023 Order at 25 and footnote 98, in which the Order clarified that it should not be construed as preventing Atmos from filing PRP ROE testimony if it determines it is appropriate to do so; and Case No. 2023-00231, Sept. 29, 2023 Order at 2.

Rate Design

Atmos's most recent base rate case was approved by the Commission in Case No. 2021-00214.[46] Pursuant to Atmos's PRP Rider tariff, the rate class allocation of the PRP revenue requirement will be in proportion to the relative base revenue share approved in Atmos's most recently concluded base rate case.[47] The rates in the Appendix B attached to this Order should produce PRP revenue requirement, with the adjustments discussed above, of $7,741,241. The Commission finds that those rates are fair, just and reasonable, and should be approved for service.

However, the Commission notes that Atmos placed its proposed rates in this matter in effect, subject to refund, on October 2, 2024, while this case was pending. The Commission finds that Atmos should refund, within 60 days from the date of service of this Order, each of its customers all amounts collected for service rendered from October 2, 2024, through the date of entry of this Order that are in excess of the rates set forth in Appendix B attached to this Order. In addition, within 75 days from the date of service of this Order, Atmos should also file a written report into the case record that describes its efforts to refund all monies collected in excess of the rates that are set forth in the Appendix B to this Order. Furthermore, following the filing of the written report, the Commission reserves its right to initiate an investigation to determine whether Atmos reasonably refunded all monies collected in excess of the rates that are set forth in the Appendix B to this Order.

[46] Case No. 2021-00214, May 19, 2022 Order.

[47] PSC KY No. 2, Second Revised Sheet No. 38.

IT IS THEREFORE ORDERED that:

1. The PRP rates proposed by Atmos are denied.

2. The PRP rates in Appendix B to this Order are approved for service rendered by Atmos on and after the October 2, 2024.

3. Atmos may use the PRP ROE approved in its most recent general rate case, as of the time it makes its PRP filing, in its future PRP filing without filing ROE testimony, unless and until the Commission orders otherwise.

4. Within 20 days of the date of entry of this Order, Atmos shall file with this Commission, using the Commission's electronic Tariff Filing System, revised tariff sheets setting out the rates approved herein and reflecting that they were approved pursuant to this Order.

5. Within 60 days of the date of service of this Order, Atmos shall refund to its customers all amounts collected for service rendered from October 2, 2024, through the date of entry of this Order that are in excess of the rates set forth in the Appendix B herein attached to this Order.

6. Within 75 days of the date of service of this Order, Atmos shall submit a written report to the Commission in which it describes its efforts to refund all monies collected in excess of the rates that are set forth in the Appendix B to this Order.

7. The Commission reserves its right to initiate an investigation to determine whether Atmos reasonably refunded all monies collected in excess of the rates that are set forth in the Appendix B to this Order should the Commission deem it necessary.

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

PUBLIC SERVICE COMMISSION

Chairman

Vice Chairman

Mary Pat Regan

Commissioner

ATTEST:

Linda Bridwell RP

Executive Director

ENTERED
MAY 29 2025
AH
KENTUCKY PUBLIC
SERVICE COMMISSION

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2024-00226 DATED MAY 29 2025

Line Number	Description	Total
1	Project Additions	$69,613,308
2	Project Retirements	$ (8,392,876)
3	**Net Change to Gross Plant**	$61,220,432
4	Cost of Removal to Accumulated Depr.	$ 3,538,383
5	Retirements from Accumulated Depr.	8,392,876
6	Depreciation Accrual to Accumulated Depr.	(1,409,805)
7	**Net Change to Accumulated Depreciation**	10,521,454
8	**Net Change to Net Plant**	$71,741,887
9	Accumulated Deferred Income Taxes	(4,284,445)
10	**Net Change to Rate Base**	$67,457,442
11	Rate of Return	6.94%
12	**Required Operating Income**	$ 4,678,848
13	Depreciation & Amortization Expense	1,092,101
14	O&M Savings	(12,257)
15	Ad Valorem Tax Increase	596,566
16	Income Taxes on Cost of Service Items	(418,264)
17	Income Taxes on Adjusted Interest Expense	(300,553)
18	**Operating Income at Present Rates**	$ 957,592
19	Deficiency	$ 5,636,440
20	Tax Factor	74.56%
21	**Total Rate Adjustment before True-up**	$ 7,559,794
22	Project Cost True-up	$ 27,120
23	Revenue Recovery True-up	154,327
24	**Total True-up**	$ 181,447
25	**Total Rate Adjustment**	$ 7,741,241
26	Prior Approved Rate Adjustment*	$ 4,493,517
27	Increase in Rate Adjustment from Previous Year	$ 3,247,724

Note: This is the 2024 PRP Rate Adjustment as approved in Case No. 2023-00231

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2024-00226 DATED MAY 29 2025

The following rates and charges are prescribed for the customers in the area served by Atmos Energy Corporation. All other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of the Commission prior to the effective date of this Order.

Pipeline Replacement Program Rider Rates

	Monthly Customer Charge		Distribution Charge per Mcf
Rate G-1 (Residential)	$ 0.00	1-300 Mcf	$ 0.4256
		301-15,000 Mcf	$ 0.4256
		Over 15,000 Mcf	$ 0.4256
Rate G-1 (Non-Residential)	$ 0.00	1-300 Mcf	$ 0.3120
		301-15,000 Mcf	$ 0.2169
		Over 15,000 Mcf	$ 0.2169
Rate G-2	$ 0.00	1-15,000 Mcf	$ 0.1257
		Over 15,000 Mcf	$ 0.1031
Rate T-3	$ 0.00	1-15,000 Mcf	$ 0.0801
		Over 15,000 Mcf	$ 0.0657
Rate T-4	$ 0.00	1-300 Mcf	$ 0.1217
		301-15,000 Mcf	$ 0.0846
		Over 15,000 Mcf	$ 0.0699

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