

Exhibit 7: Cost Allocation

7.1 Building a Viable Utility

1. In arriving at the revenue requirement that was established in the Board's Southern Bruce Expansion Decision, EPCOR understood that, as a new gas distribution utility with no existing customers, the utility's viability depends on attracting customers that are currently obtaining their energy needs from other sources. Conversion of customers must also take place in a timely manner as before the end of 2021 the utility faces a level of fixed costs which reflect a fully constructed system.
2. Based on these two fundamental observations, EPCOR addressed three questions.
 - i. What level of savings do potential customers require to convert to natural gas?
 - ii. How many customers will convert at those savings level?
 - iii. Based on informed answers to these two questions, can the utility generate sufficient revenue to fund a sustainable natural gas system?
3. To answer the first question, EPCOR looked to the results of its Southern Bruce County NG Line Load Forecasting Survey ("**Survey**") (see Exhibit 1 Tab 3 Schedule 1) which indicated that price was the number one reason for conversion (77%¹) and that there appeared to be a direct relationship between the likelihood of conversion and expected savings (varying between 44% and 58% depending on savings scenario tested²). Informed by the results of the Survey, and applying management judgement, EPCOR concluded that customers would have to anticipate savings of greater than 20% in order to consider converting to natural gas in numbers high enough to sustain the utility. This would allow them to fund any on site conversion costs and generate noticeable savings in the longer term.

¹ Southern Bruce Count NG Line Load Forecasting Survey, July 19, 2017, page 41

² Ibid, page 45

4. To answer the second question, EPCOR was again informed by the Survey, the business case³ as detailed in Exhibit 1. This resulted in the customer conversion values that EPCOR is at risk for and is detailed in Exhibit 3 Tab 1 Schedule 1.
5. The above analysis informed EPCOR's forecast of revenue the utility could expect to generate and compare that against the costs to construct and operate the system. This analysis determined there is a positive business case in providing customers in the Southern Bruce region access to natural gas, and confirmed EPCOR's revenue requirement established in the Board's Southern Bruce Expansion Decision.
6. The CIP process did not establish rates for individual rate classes but in building up its revenue requirement as detailed above, EPCOR worked to confirm the level of revenue from each rate class (based on savings to consumers at a certain rate level). Should any approved rates vary from those proposed in this Application, there could be impacts to customers' savings which in turn would directly affect conversion rates. Further, any impact on conversion rates in one rate class would have implications for rates in all other rate classes (and thus, the conversion rates in those rate classes) since the total revenue requirement will not change and rates would have to increase/decrease in other rate classes to compensate. In order to remain economic, the utility needs to realize the expected conversion rates in all classes (i.e., neither residential, commercial or industrial customers on their own can generate sufficient revenue to make the utility viable). If the established revenue requirement is not achieved then the ability of all customer classes to take advantage of the lower fuel costs and environmental benefits of converting to natural gas may be lost as the long term sustainability of the utility would be at risk.

³ Expansion of Natural Gas Distribution in Southern Bruce County, The Business Case, October 6, 2014, Prepared by BLG

7.2 Cost Allocation Study

1. The cost allocation study (the “**Study**”) detailed in this Exhibit 7 apportions the forecasted 2028 revenue requirement to each of the four proposed customer rate classes. EPCOR is proposing to use its forecasted 2028 revenue requirement and customer count as the “test” year for cost allocation as by that year construction and any necessary refinements of the system will be complete and the period of rapid customer growth will have tapered off. At that point, the Southern Bruce system is expected to be a stable and sustainable operation with sufficient customers to support its long term economics. The proportion of customers and demand in each rate class, and resulting cost causation, is not expected to change materially over the longer term.
2. EPCOR notes that this Study is useful as it serves as a comparison and a reasonableness check of the rates and resulting revenue proposed to be recovered from each rate class. However, caution should be exercised in attempting to rely on it to directly establish rates for the utility. In completing this Study, EPCOR is using its current best view of what the Southern Bruce System will look like in 2028. As the system has yet to be built, has no customers, and no operating history, this view is based on its CIP, its Aylmer natural gas system and management judgement. Therefore, the results of the Study must be interpreted with caution as, even to one decimal place, they reflect current best estimates. This is in comparison to a typical cost allocation study which is based on the operating history of a mature system and can be comfortably used directly as a basis on which to establish rates.
3. The results of the Study are summarized in the tables below including the forecasted revenues, cost of service allocation, and revenue to cost ratio for each customer class. Table 7-1 presents the results before external funding, and Table 7-2 presents the results after external funding has been applied. As shown in Table 7-1 below, the revenue to cost ratios for each customer class range from 0.6 to 1.02 indicating that the proposed revenue to be recovered from each rate class is within a range of plus or minus 20%.

Table 7-1: Distribution Revenue to Cost Comparison in the Absence of External Funding
 (Thousands of Dollars Except for Ratios)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Description	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Revenue	7,791.88	5,244.64	1,030.98	241.93	1,274.32
Row 2 Cost of Service	9,211.61	6,013.27	1,708.72	236.68	1,252.95
Row 3 Over / Under Contributions	-1,419.73	-768.62	-677.73	5.26	21.37
Row 4 Revenue to Cost Ratio	0.85	0.87	0.60	1.02	1.02

4. Table 7-2 highlights that all rate classes are benefiting from the application of external funding.

Table 7-2: Distribution Revenue to Cost Comparison with External Funding
 (Thousands of Dollars Except for Ratios)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Description	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Revenue	7,791.88	5,244.64	1,030.98	241.93	1,274.32
Row 2 Cost of Service	7,683.39	5,205.54	1,341.28	191.05	945.52
Row 3 Over / Under Contributions	108.49	39.10	-310.30	50.88	328.81
Row 4 Revenue to Cost Ratio	1.01	1.01	0.77	1.27	1.35

7.3 Cost Allocation Overview

1. EPCOR has applied accepted cost allocation principles and used a three-step methodology of functionalization, classification and allocation of the costs to provide service. The Study categorizes all costs into functional areas (gas supply, distribution related, customer and administrative) which are then classified as being commodity, demand, or customer related. These three major cost components are then allocated to the proposed customer rate classes based on allocation factors derived from basic customer data.
2. The Study has been completed for 2028, the last year of the 10-year rate stability period as this is the year where the customer attachments, distribution system infrastructure and operations are the most representative of a fully mature gas distribution system.
3. As an expansion project with no operating history, accounting data or actual customer usage information, EPCOR has used proxy data and factors from the 2010 Fully Allocated Costing Study completed for EPCOR's Aylmer operation⁴ (previously Natural Resource Gas Limited). Given the absence of any historical utility data to draw from, this method provides the data needed to complete the Study and enables EPCOR to determine a reasonable estimate of the costs to service each rate class.
4. The financial viability of the Southern Bruce system is dependent on receiving funding in addition to the revenue generated by rate payers. As detailed in Exhibit 1, EPCOR has been awarded a \$22M grant to support the South Bruce project. The intent of the grant is to "support the building of new natural gas infrastructure in order to expand access to more communities and to accelerate projects with economic development potential,"⁵. EPCOR has allocated the proceeds from external funding in a manner that is aligned with general cost allocation principles.
5. The proposed allocation supports the expansion of natural gas into the South Bruce Municipalities by ensuring rates are attractive enough that potential customers in all classes will attach to the system. Alternative allocations may increase the attractiveness of conversion for certain classes of customers (e.g. Rate 1 vs Rate 16), however, the long term viability of the system requires that

⁴ EB-2010-0018, Exhibit G

⁵ Natural Gas Program, 2017 Program Guidelines, Ministry of Infrastructure, page 2

customer conversions reach levels as committed to by EPCOR in its CIP. In the absence of these conversions the system may be unable to generate sufficient revenue to support safe and reliable operations, potentially leading to material rate increases at the end of the rate stability period. Material rate increases would then further reduce the attractiveness of the system to customers, potentially creating a “death spiral” in which a shrinking number of customers leads to further price increases.

6. The Survey suggests that moving from a medium to low cost savings scenario would reduce “likely” conversions from 58% to 44%. This could result in over 1,240⁶ fewer residential customers at the end of the rate stability period and approximately \$1.2 million lower distribution revenue in 2028.
7. ENGLP will submit a cost of service study in year 10 for rates to be effective in year 11 (2029).

⁶ Estimated total residential market of 8,030. EPCOR’s 60% target connection rate of 4,818 residential versus 44% × 8,030 = 3,533 residential connections.

7.4 Cost Allocation Study

1. The input data to the cost allocation analysis is based on the revenue requirement forecast for year 10 (2028) of the rate stability period. This includes a forecast of rate base and working capital, depreciation expense, property tax and operating expenses as presented in Exhibits 2, 3 and 4. Customer volumes and demand input data is as provided in Exhibit 3.

Functionalization

2. The first step is to functionalize the forecast cost data into the various functions as summarized below:
 - i. Gas Supply – the cost of gas commodity delivered to the Dawn Hub and working capital allowance
 - ii. Storage – market-based storage with Union Gas or an alternative provider
 - iii. Upstream Transportation – Union Gas transportation service for the delivery of gas from Dawn to a delivery point at the interconnection between Union’s System and EPCOR’s System, referred to as Dornoch Meter and Regulator Station
 - iv. Load Balancing – Administrative charges related to the daily nominations of gas and other gas reconciliation activities such as determination of load balancing charge allocation when incurred
 - v. Distribution Mains HP Steel – high pressure distribution mains
 - vi. Distribution Measurement – stations that measure flows to Distribution Mains and high volume customers
 - vii. Distribution Mains – low pressure distribution mains
 - viii. Customer Services – the lateral pipeline connecting the distribution mains to individual customer locations
 - ix. Customer Meters – records consumption at individual customer locations
 - x. Billing & Accounting – preparation of customer bills, accounting and regulatory functions
 - xi. Promotion – customer marketing functions
 - xii. Bad Debt and Collection – functions related to bad debt and collection of delinquent accounts

- xiii. Industrial Direct Assignment – costs directly assigned to customers taking service on the high-pressure distribution system
 - xiv. A&G – administrative and general functions
3. The functionalization of Rate Base, Depreciation, Property Taxes, O&M Expenses and Deferred Revenue are provided in Schedule 2. In the absence of any historical operating data to rely upon and where noted, EPCOR has used EPCOR's data from its Aylmer operations as a proxy.

Rate Base (Table 7-5)

4. The estimated net book value for distribution mains (high pressure and low pressure), customer services and meters has been functionalized to these same categories. The functionalization of other asset categories is as shown below.
- i. Contribution in Aid of Construction (CIAC) to Union – a capital contribution paid to Union Gas to related to its Owen Sound Transmission Reinforcement project has been functionalized as Upstream Transportation
 - ii. Distribution Land Rights – the land rights are for meter stations and have therefore been functionalized as Distribution Measurement
 - iii. Distribution Measuring and Regulating Equipment – a direct functionalization to Industrial Direct Assignment based on the estimated cost of equipment used by Rate 16 customers only, with the balance functionalized as Distribution Measurement
 - iv. Vehicles - functionalized to both Distribution Mains (62%) and Customer Services (38%) based on EPCOR's Aylmer operations functionalization
 - v. Machinery and Equipment - functionalized to both Distribution Mains (62%) and Customer Services (38%) based on EPCOR's Aylmer operations functionalization
 - vi. Working Capital – functionalized in proportion to OM&A costs

Depreciation Expense (Table 7-6) is the functionalization of depreciation expense corresponding to the rate base asset categories.

Property Taxes (Table 7-7) is the functionalization of property tax expenses corresponding to the rate base asset categories.

OM&A Expenses (Table 7-8) is the functionalization of gas supply, storage, load balancing and upstream transportation costs. The functionalization of other OM&A Expenses is as described below.

- i. Salaries and Wages – functionalized to distribution, customer and administrative related functions based on EPCOR's Aylmer operations functionalization

- ii. Utilities - functionalized to distribution, customer and administrative related functions based on EPCOR's Aylmer operations functionalization
 - iii. Insurance - functionalized to distribution, customer and administrative related functions based on EPCOR's Aylmer operations functionalization
 - iv. Repairs and Maintenance - functionalized to distribution, customer and administrative related functions based on EPCOR's Aylmer operations functionalization
 - v. Vehicles - functionalized to Distribution Mains (HP and LP) and Customer Services based on EPCOR's Aylmer operations functionalization
 - vi. Office Administration – functionalized as Administrative and General (A&G)
 - vii. Contractors & Emergency Services - functionalized to Distribution Mains (HP and LP) and Customer Services based on EPCOR's Aylmer operations functionalization
 - viii. Shared Services & BU Allocations - functionalized as Administrative and General (A&G)
 - ix. Marketing - functionalized as Promotion
5. Deferred Revenues are functionalized in accordance with the sources of the deferred revenue below:
- x. Deferred recovery of Transportation and Storage costs are functionalized as Upstream Transportation
 - xi. Deferred recovery of Rates 1, 6 and 11's Upstream Recovery Costs are functionalized as Upstream Transportation
 - xii. Deferred recovery of Rate 16's Upstream Recovery Costs are functionalized as Industrial Direct Assignment

Classification

6. The second step is to allocate the functionalized costs into gas supply, capacity or customer related classifications as summarized below. Again, in the absence of historical operating data, EPCOR has relied on factors adopted from EPCOR's cost allocation study for its Aylmer operations.

Gas Supply:

- i. Commodity
- ii. Upstream Capacity

- iii. Storage Space
- iv. Storage Deliverability
- v. Delivery Commodity

Capacity:

- i. Capacity HP
- ii. Capacity LP
- iii. Industrial Direct Assignment

Customer:

- i. Customer (unweighted)
- ii. Customer weighted Services
- iii. Customer weighted Meters
- iv. Customer weighted Billing
- v. Customer excl. Industrial
- vi. Bad Debts & Collection

7. Classification of functionalized rate base, depreciation, property taxes are shown in Exhibit 7 Tab 1 Schedules 3.

Rate Base (Table 7-15)

8. The rate base items functionalized as Gas Supply, Storage, Load Balancing and Upstream Transportation consists of the working capital and capitalized transportation related to the purchase and delivery of gas commodity to the Southern Bruce distribution system. Each of these functions is classified as follows:
- i. Gas Supply – classified as Commodity
 - ii. Storage – classified as Storage Space (40%) and Storage Deliverability (60%)
 - iii. Load Balancing – classified as Upstream Capacity (60%) and Delivery Commodity (40%)

- iv. Upstream Transportation – classified as Upstream Capacity (95%) and Delivery Commodity (5%). The delivery commodity component reflects the fuel cost of the Union Gas transportation service.
9. Distribution Mains HP Steel is classified as Capacity HP. All other distribution mains are classified as 67% Capacity LP and 33% Customer Excluding Industrial.
10. Customer Services and Customer Meters rate base functions are classified to Customer Weighted Services and Customer Weighted Meters, respectively.
11. The classification of the remaining rate base functions is as follows:
- i. Distribution Measurement – classified to Delivery Commodity (50%) and Capacity HP (50%) based on EPCOR’s Aylmer operations classification (C5 Dist. Measurement)
 - ii. Billing & Accounting – classified to Customer Weighted Billing
 - iii. Promotion – classified to Customer (unweighted)
 - iv. Bad Debts and Collections – classified to Bad Debt/ Collection
 - v. Industrial Direct Assignment – classified as Industrial Direct Assignment
 - vi. A&G – classified on a pro rata basis to the Capacity and Customer related classifications

Depreciation

12. The classification for depreciation property tax expenses follows the same classification of the corresponding rate based fixed assets in Schedule 2.

Property Taxes

13. The classification for property tax expenses follows the same classification of the corresponding rate based fixed assets in Schedule 2.

OM&A

14. The functionalized OM&A costs follow the same classification of the corresponding rate base fixed assets in schedule 2.

Allocation

15. In this last step, the classified costs are allocated to each of the four customer rate classes in accordance with the allocation factors as summarized below. The allocation factors are based on

the 10 year forecast for customer connections, sales volumes, and capacity. For the Customer Weighted Services, Meters and Billing allocations, an adjustment factor has been applied to better reflect the level of effort and cost for each customer rate class. As an example, the weighting factor for residential and industrial customer billing is 1.0 and 10.0 respectively. This factor is to recognize that the costs associated with a residential bill is estimated to be one tenth of an industrial bill. Factors for Customer Weighted Meters and Billing from EPCOR's Aylmer operations have been adopted for Southern Bruce. The factors for customer weighted services are based on the estimated average cost of a service for each customer class of EPCOR Southern Bruce.

16. Rate base is allocated to the rate classes based on the allocation factors shown in Tab 1 Schedule 4 Table 7 – 25.
17. Return and income taxes are allocated based on the same allocation of the rate base. The rationale is that rate base attracts income, and income attracts income taxes.
18. Depreciation and property taxes are allocated based on allocation factors in Tab 1 Schedule 4 Table 7 – 25 of Appendix and the corresponding classified expenses.
19. O&M expenses are allocated to the rate classes based on allocation factors in Tab 1 Schedule 4 Table 7 – 25 of Appendix and the corresponding classified expenses.
20. The allocation of LEAP funding cost is directly allocated to each of the rate classes equal to 0.12% of the distribution revenues collected from the rate classes.
21. EPCOR is estimated to incur \$30.00 of miscellaneous costs for adding every new connection. The allocation of this cost ("Other Costs") is based on the number of new connections added in each of the rate classes.

7.5 Summary of Results

The results of the cost allocation analysis indicate that EPCOR's Total ("Distribution and Non-Distribution") revenue to cost ratios are within a target range of plus or minus 25% as shown in Tables 7-3. Table 7-4 indicates that EPCOR's Distribution overall revenue to cost ratio is 1.01 in year 2028. However, this ratio is expected to be much less than 1.0 in years prior to achieving a mass customer base.

Table 7-3: Total Revenue to Cost Comparison (Thousands of Dollars Except for Ratios)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Description	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Revenue	11,419.44	7,467.79	1,862.87	459.34	1,629.44
Row 2 Cost of Service	11,310.95	7,428.69	2,173.16	387.13	1,321.97
Row 3 Over / Under Contributions	108.49	39.10	-310.30	72.21	307.47
Row 4 Revenue to Cost Ratio	1.01	1.01	0.86	1.19	1.23

Table 7-4: Distribution Revenue to Cost Comparison (Thousands of Dollars Except for Ratios)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Description	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Revenue	7,791.88	5,244.64	1,030.98	241.93	1,274.32
Row 2 Cost of Service	7,683.39	5,205.54	1,341.28	191.05	945.52
Row 3 Over / Under Contributions	108.49	39.10	-310.30	50.88	328.81
Row 4 Revenue to Cost Ratio	1.01	1.01	0.77	1.27	1.35

Functionalization of Distribution and Non-Distribution Costs

Table 7-5: Functionalization of Rate Base (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Asset Category	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H.P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 CIAC to Union - Owen Sound Reinforcement	1,946.11	0.00	0.00	0.00	1,172.05	774.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 CIAC to Union - Station	2,239.54	0.00	0.00	0.00	1,348.77	890.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Distribution Mains - Metallic	19,249.77	0.00	0.00	0.00	0.00	0.00	19,249.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Distribution Land Rights	32.02	0.00	0.00	0.00	0.00	0.00	0.00	32.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Distribution Mains - Plastic	18,614.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,614.68	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Distribution Services Plastic	8,158.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,158.01	0.00	0.00	0.00	0.00	0.00
Row 7 Distribution Meters	2,468.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,468.19	0.00	0.00	0.00	0.00
Row 8 Distribution Measuring and Regulating Equipt.	1,090.82	0.00	0.00	0.00	0.00	0.00	0.00	1,090.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 9 Vehicles	463.54	0.00	0.00	0.00	0.00	0.00	140.37	0.00	146.10	177.07	0.00	0.00	0.00	0.00	0.00
Row 10 Machinery and Equipment	173.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	107.42	66.40	0.00	0.00	0.00	0.00	0.00
Row 11 Working Capital Allowance	503.87	201.64	17.91	2.22	30.64	19.66	13.94	0.12	13.56	35.57	3.90	38.15	14.84	3.64	108.09
Row 12 Total	54,940.37	201.64	17.91	2.22	2,551.47	1,684.49	19,404.08	1,122.96	18,881.76	8,437.05	2,472.09	38.15	14.84	3.64	108.09

Table 7-6: Functionalization of Depreciation (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Asset Category	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H.P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 CIAC to Union - Owen Sound Reinforcement	46.34	0.00	0.00	0.00	27.91	18.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 CIAC to Union - Station	77.23	0.00	0.00	0.00	46.51	30.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Distribution Mains - Metallic	740.38	0.00	0.00	0.00	0.00	0.00	740.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Distribution Land Rights	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Distribution Mains - Plastic	533.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	533.85	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Distribution Services Plastic	245.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	245.69	0.00	0.00	0.00	0.00	0.00
Row 7 Distribution Meters	129.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	129.09	0.00	0.00	0.00	0.00
Row 8 Distribution Measuring and Regulating Equip.	58.86	0.00	0.00	0.00	0.00	0.00	0.00	58.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 9 Vehicles	82.67	0.00	0.00	0.00	0.00	0.00	25.04	0.00	26.06	31.58	0.00	0.00	0.00	0.00	0.00
Row 10 Machinery and Equipment	19.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.94	7.38	0.00	0.00	0.00	0.00	0.00
Row 11 Total	1,934.03	0.00	0.00	0.00	74.42	49.15	765.41	59.47	571.84	284.65	129.09	0.00	0.00	0.00	0.00

Table 7-7: Functionalization of Property Taxes (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Asset Category	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H.P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 CIAC to Union - Owen Sound Reinforcement	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 CIAC to Union - Station	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Distribution Mains - Metallic	261.03	0.00	0.00	0.00	0.00	0.00	261.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Distribution Land Rights	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Distribution Mains - Plastic	186.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	186.07	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Distribution Services Plastic	155.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	155.89	0.00	0.00	0.00	0.00	0.00
Row 7 Distribution Meters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 8 Distribution Measuring and Regulating Equipt.	27.03	0.00	0.00	0.00	0.00	0.00	0.00	27.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 9 Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 10 Machinery and Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 11 Total	630.02	0.00	0.00	0.00	0.00	0.00	261.03	27.03	186.07	155.89	0.00	0.00	0.00	0.00	0.00

Table 7-8: Functionalization of OM&A (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Expense Item	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H.P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 Gas Commodity Cost	2,365.90	2,365.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 Storage	210.14	0.00	210.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Load Balancing	25.99	0.00	0.00	25.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Union Transportation Charge	359.53	0.00	0.00	0.00	359.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Salaries & Wages & Benefits	1,160.51	0.00	0.00	0.00	0.00	0.00	61.40	0.00	59.74	291.74	36.46	279.31	125.47	30.32	276.07
Row 6 Utilities	19.74	0.00	0.00	0.00	0.00	0.00	1.04	0.00	1.02	4.96	0.62	4.75	2.13	0.52	4.69
Row 7 Billing & Collection	115.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	108.46	0.00	7.50	0.00
Row 8 Insurance	63.19	0.00	0.00	0.00	0.00	0.00	1.56	0.00	1.51	2.12	0.04	0.29	0.13	0.03	57.51
Row 9 Repairs & Maintenance	63.19	0.00	0.00	0.00	0.00	0.00	8.59	1.30	8.36	15.08	4.31	12.13	1.05	0.25	12.10
Row 10 Vehicle & Travel	60.32	0.00	0.00	0.00	0.00	0.00	16.69	0.00	16.24	20.36	0.00	0.00	0.00	0.00	7.03
Row 11 Office & Administrative	121.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	121.34
Row 12 Contractors & Emergency Services	159.09	0.00	0.00	0.00	0.00	0.00	58.68	0.00	57.10	43.32	0.00	0.00	0.00	0.00	0.00
Row 13 Shared Services & BU Allocations	668.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	668.67
Row 14 Marketing	28.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.72	0.00	0.00
Row 15 Franchise Fee	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 16 Deferred Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 17 Load Balancing - Industrial	22.88	0.00	0.00	0.00	0.00	22.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 18 Union Transportation Charge - Industrial	207.84	0.00	0.00	0.00	0.00	207.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 19 Total	5,653.01	2,365.90	210.14	25.99	359.53	230.73	147.96	1.30	143.97	377.58	41.42	404.93	157.51	38.62	1,147.41

Table 7-11: Functionalization of Cost of Service (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Expense Item	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 Depreciation	1,934.03	0.00	0.00	0.00	74.42	49.15	765.41	59.47	571.84	284.65	129.09	0.00	0.00	0.00	0.00
Row 2 Property Taxes	630.02	0.00	0.00	0.00	0.00	0.00	261.03	27.03	186.07	155.89	0.00	0.00	0.00	0.00	0.00
Row 3 O&M	5,653.01	2,365.90	210.14	25.99	359.53	230.73	147.96	1.30	143.97	377.58	41.42	404.93	157.51	38.62	1,147.41
Row 4 Return on Rate Base	3,001.50	11.02	0.98	0.12	139.39	92.03	1,060.08	61.35	1,031.55	460.93	135.06	2.08	0.81	0.20	5.91
Row 5 Disposition of Deferred Revenue	46.99	0.00	0.00	0.00	43.80	3.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Carrying Cost of Deferred Revenue	35.84	0.00	0.00	0.00	33.40	2.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 7 Total	11,301.39	2,376.92	211.12	26.11	650.55	377.52	2,234.49	149.15	1,933.44	1,279.05	305.57	407.02	158.32	38.82	1,153.32

Table 7-12: Functionalization Factors of Rate Base

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Asset Category	Total	Gas Supply	Storage	Load Balancing	Upstream Transportation	Industrial Direct Assignment	Distribution Mains H.P. Steel	Distribution Measurement	Distribution Mains	Customer - Services	Customer - Meters	Billing and Accounting	Promotion	Bad Debt and Collection	A&G
Row 1 CIAC to Union - Owen Sound Reinforcement	100%	0%	0%	0%	60%	40%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 2 CIAC to Union - Station	100%	0%	0%	0%	60%	40%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 3 Distribution Mains - Metallic	100%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%
Row 4 Distribution Land Rights	100%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%
Row 5 Distribution Mains - Plastic	100%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%
Row 6 Distribution Services Plastic	100%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%
Row 7 Distribution Meters	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%
Row 8 Distribution Measuring and Regulating Equipt.	100%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%
Row 9 Vehicles	100%	0%	0%	0%	0%	0%	30%	0%	32%	38%	0%	0%	0%	0%	0%
Row 10 Machinery and Equipment	100%	0%	0%	0%	0%	0%	0%	0%	62%	38%	0%	0%	0%	0%	0%
Row 11 Working Capital Allowance	100%	40%	4%	0%	6%	4%	3%	0%	3%	7%	1%	8%	3%	1%	21%

Classification of Distribution and Non-Distribution Costs

Table 7-15: Classification of Rate Base

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Function	Total	Commodity	Upstream Capacity	Storage Space	Storage Deliverability	Industrial Direct Assignment	Delivery Commodity	Capacity HP	Capacity LP	Customer	Customer Weighted Services	Customer Weighted Meters	Customer Weighted Billing	Customer Excluding Industrial	Bad Debt / Collection
Row 1 Gas Supply	201.64	201.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 Storage	17.91	0.00	0.00	7.16	10.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Load Balancing	2.22	0.89	1.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Upstream Transportation	2,551.47	56.34	2,495.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Industrial Direct Assignment	1,684.49	0.00	0.00	0.00	0.00	1,684.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Distribution Mains H.P. Steel	19,404.08	0.00	0.00	0.00	0.00	0.00	0.00	19,404.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 7 Distribution Measurement	1,122.96	0.00	0.00	0.00	0.00	0.00	561.48	340.82	220.66	0.00	0.00	0.00	0.00	0.00	0.00
Row 8 Distribution Mains	18,881.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12,562.04	0.00	0.00	0.00	0.00	6,319.73	0.00
Row 9 Customer - Services	8,437.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,437.05	0.00	0.00	0.00	0.00
Row 10 Customer - Meters	2,472.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,472.09	0.00	0.00	0.00
Row 11 Billing and Accounting	38.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	38.15	0.00	0.00
Row 12 Promotion	14.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14.84	0.00	0.00	0.00	0.00	0.00
Row 13 Bad Debt and Collection	3.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.64
Row 14 A&G	108.09	0.00	0.00	0.00	0.00	0.00	1.20	42.37	27.43	0.03	18.10	5.30	0.08	13.56	0.01
Row 15 Total	54,940.37	258.86	2,496.46	7.16	10.75	1,684.49	562.68	19,787.26	12,810.12	14.87	8,455.15	2,477.40	38.23	6,333.29	3.65

Table 7-16: Classification of Cost of Service

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Expense Item	Total	Commodity	Upstream Capacity	Storage Space	Storage Deliverability	Industrial Direct Assignment	Delivery Commodity	Capacity HP	Capacity LP	Customer	Customer Weighted Services	Customer Weighted Meters	Customer Weighted Billing	Customer Excluding Industrial	Bad Debt / Collection
Row 1 Gas Supply	2,376.92	2,376.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 2 Storage	211.12	0.00	0.00	84.45	126.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 3 Load Balancing	26.11	10.45	15.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 4 Upstream Transportation	650.55	14.37	636.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 5 Industrial Direct Assignment	377.52	0.00	0.00	0.00	0.00	377.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 6 Distribution Mains H.P. Steel	2,234.49	0.00	0.00	0.00	0.00	0.00	0.00	2,234.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Row 7 Distribution Measurement	149.15	0.00	0.00	0.00	0.00	0.00	74.58	45.27	29.31	0.00	0.00	0.00	0.00	0.00	0.00
Row 8 Distribution Mains	1,933.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,286.32	0.00	0.00	0.00	0.00	647.12	0.00
Row 9 Customer - Services	1,279.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,279.05	0.00	0.00	0.00	0.00
Row 10 Customer - Meters	305.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	305.57	0.00	0.00	0.00
Row 11 Billing and Accounting	407.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	407.02	0.00	0.00
Row 12 Promotion	158.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	158.32	0.00	0.00	0.00	0.00	0.00
Row 13 Bad Debt and Collection	38.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	38.82
Row 14 A&G	1,153.32	0.00	0.00	0.00	0.00	0.00	13.22	404.14	233.23	28.07	226.74	54.17	72.15	114.72	6.88
Row 15 Total	11,301.39	2,401.73	651.85	84.45	126.67	377.52	87.80	2,683.89	1,548.85	186.39	1,505.79	359.74	479.17	761.84	45.70

Table 7-17: Classification Factors

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14	Col. 15
Function	Total	Commodity	Upstream Capacity	Storage Space	Storage Deliverability	Industrial Direct Assignment	Delivery Commodity	Capacity HP	Capacity LP	Customer	Customer Weighted Services	Customer Weighted Meters	Customer Weighted Billing	Customer Excluding Industrial	Bad Debt / Collection
Row 1 Gas Supply	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 2 Storage	100%	0%	0%	40%	60%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 3 Load Balancing	100%	40%	60%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 4 Upstream Transportation	100%	2%	98%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 5 Industrial Direct Assignment	100%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Row 6 Distribution Mains H.P. Steel	100%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%
Row 7 Distribution Measurement	100%	0%	0%	0%	0%	0%	50%	30%	20%	0%	0%	0%	0%	0%	0%
Row 8 Distribution Mains	100%	0%	0%	0%	0%	0%	0%	0%	67%	0%	0%	0%	0%	33%	0%
Row 9 Customer - Services	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%
Row 10 Customer - Meters	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%
Row 11 Billing and Accounting	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%
Row 12 Promotion	100%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%
Row 13 Bad Debt and Collection	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%
Row 14 A&G	100%	0%	0%	0%	0%	0%	1%	35%	20%	2%	20%	5%	6%	10%	1%

Allocation of Distribution and Non-Distribution Costs

Table 7-18: Allocator Percentages by Rate Class

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6
Allocation Factor	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service	Reference
Row 1 Commodity Volume Including Industrial	100.00%	29.79%	8.84%	3.36%	58.01%	Vol 1
Row 2 Commodity Volume Excluding Industrial	100.00%	70.95%	21.05%	8.00%	0.00%	Vol 2
Row 3 Coincidental Peak	100.00%	37.72%	22.92%	0.00%	39.36%	CP 1
Row 4 Non-coincidental Peak	100.00%	38.34%	23.29%	5.03%	33.34%	NCP 1
Row 5 Weighted Peak (Avg of CP 1 & NCP 1)	100.00%	38.05%	23.12%	2.72%	36.10%	WCP 1
Row 6 Coincidental Peak Excluding Industrial	100.00%	62.20%	37.80%	0.00%	0.00%	CP 2
Row 7 Non-coincidental Peak Excluding Industrial	100.00%	57.51%	34.94%	7.54%	0.00%	NCP 2
Row 8 Weighted Peak Excluding Industrial (Avg of CP 2 & NCP 2)	100.00%	59.55%	36.19%	4.26%	0.00%	WCP 2
Row 9 Winter Excess Volume	100.00%	57.22%	41.00%	1.78%	0.00%	SPC
Row 10 Peak Demand Over Winter Volume	100.00%	58.89%	38.48%	2.63%	0.00%	DLB
Row 11 Customer	100.00%	98.14%	1.73%	0.09%	0.04%	Cus 1
Row 12 Customer Weighted by Services	100.00%	89.92%	7.38%	1.56%	1.14%	CusS
Row 13 Customer Weighted by Meters	100.00%	73.40%	19.05%	5.40%	2.16%	CusM
Row 14 Customer Weighted by Billing	100.00%	96.98%	1.71%	0.94%	0.37%	CusB
Row 15 Customer Excluding Industrial	100.00%	90.96%	7.46%	1.58%	0.00%	Cus 2
Row 16 Industrial Direct Assignment	100.00%	0.00%	0.00%	0.00%	100.00%	Ind
Row 17 Bad Debt / Collection	100.00%	83.57%	16.43%	0.00%	0.00%	BD

Table 7-19: Allocation of Classified Costs by Rate Class

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Classification	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Commodity	100%	71%	21%	8%	0%
Row 2 Upstream Capacity	100%	62%	38%	0%	0%
Row 3 Storage Space	100%	57%	41%	2%	0%
Row 4 Storage Deliverability	100%	59%	38%	3%	0%
Row 5 Industrial Direct Assignment	100%	0%	0%	0%	100%
Row 6 Delivery Commodity	100%	30%	9%	3%	58%
Row 7 Capacity HP	100%	38%	23%	3%	36%
Row 8 Capacity LP	100%	60%	36%	4%	0%
Row 9 Customer	100%	98%	2%	0%	0%
Row 10 Customer Weighted Services	100%	90%	7%	2%	1%
Row 11 Customer Weighted Meters	100%	73%	19%	5%	2%
Row 12 Customer Weighted Billing	100%	97%	2%	1%	0%
Row 13 Customer Excluding Industrial	100%	91%	7%	2%	0%
Row 14 Bad Debt / Collection	100%	84%	16%	0%	0%

Table 7-20: Allocation of Rate Base (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Classification	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Commodity	258.86	183.67	54.49	20.71	0.00
Row 2 Upstream Capacity	2,496.46	1,552.90	943.56	0.00	0.00
Row 3 Storage Space	7.16	4.10	2.94	0.13	0.00
Row 4 Storage Deliverability	10.75	6.33	4.13	0.28	0.00
Row 5 Industrial Direct Assignment	1,684.49	0.00	0.00	0.00	1,684.49
Row 6 Delivery Commodity	562.68	167.64	49.73	18.90	326.40
Row 7 Capacity HP	19,787.26	7,529.75	4,575.14	538.79	7,143.58
Row 8 Capacity LP	12,810.12	7,628.87	4,635.37	545.88	0.00
Row 9 Customer	14.87	14.59	0.26	0.01	0.01
Row 10 Customer Weighted Services	8,455.15	7,603.10	623.86	132.22	95.98
Row 11 Customer Weighted Meters	2,477.40	1,818.32	471.90	133.70	53.48
Row 12 Customer Weighted Billing	38.23	37.07	0.65	0.36	0.14
Row 13 Customer Excluding Industrial	6,333.29	5,760.45	472.66	100.17	0.00
Row 14 Bad Debt / Collection	3.65	3.05	0.60	0.00	0.00
Row 15 Total	54,940.37	32,309.85	11,835.29	1,491.15	9,304.08

Table 7-21: Allocation of Costs of Service Excluding LEAP Funding and Other Costs (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Classification	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Commodity	2,401.73	1,704.06	505.52	192.15	0.00
Row 2 Upstream Capacity	651.85	405.48	246.37	0.00	0.00
Row 3 Storage Space	84.45	48.32	34.63	1.50	0.00
Row 4 Storage Deliverability	126.67	74.60	48.74	3.34	0.00
Row 5 Industrial Direct Assignment	377.52	0.00	0.00	0.00	377.52
Row 6 Delivery Commodity	87.80	26.16	7.76	2.95	50.93
Row 7 Capacity HP	2,683.89	1,021.32	620.56	73.08	968.94
Row 8 Capacity LP	1,548.85	922.39	560.45	66.00	0.00
Row 9 Customer	186.39	182.93	3.22	0.18	0.07
Row 10 Customer Weighted Services	1,505.79	1,354.05	111.10	23.55	17.09
Row 11 Customer Weighted Meters	359.74	264.03	68.52	19.41	7.77
Row 12 Customer Weighted Billing	479.17	464.72	8.17	4.49	1.80
Row 13 Customer Excluding Industrial	761.84	692.93	56.86	12.05	0.00
Row 14 Bad Debt / Collection	45.70	38.20	7.51	0.00	0.00
Row 15 Total	11,301.39	7,199.17	2,279.41	398.69	1,424.12

Table 7-22: Allocation of Other Costs (Thousands of Dollars unless Otherwise Specified)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 New Connections (Connections)	7	7	0	0	0
Row 2 Other Costs per New Connection (\$ / New Connection)		30.00	30.00	30.00	30.00
Row 3 Other Costs	0.21	0.21	0.00	0.00	0.00

Table 7-23: Allocation of LEAP Funding Cost (Thousands of Dollars unless Otherwise Specified)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Distribution Revenue		5,245	1,031	242	1,274
Row 2 LEAP Funding as a Percentage of Dist. Revenue		0.12%	0.12%	0.12%	0.12%
Row 3 LEAP Funding Cost	9.35	6.29	1.24	0.29	1.53

Allocation of Non-Distribution Costs

Table 7-32: Allocation of Rate Base (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Classification	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Commodity	55.66	39.49	11.72	4.45	0.00
Row 2 Upstream Capacity	2,465.16	1,533.43	931.73	0.00	0.00
Row 3 Storage Space	0.00	0.00	0.00	0.00	0.00
Row 4 Storage Deliverability	0.00	0.00	0.00	0.00	0.00
Row 5 Industrial Direct Assignment	1,664.83	0.00	0.00	0.00	1,664.83
Row 6 Delivery Commodity	0.00	0.00	0.00	0.00	0.00
Row 7 Capacity HP	0.00	0.00	0.00	0.00	0.00
Row 8 Capacity LP	0.00	0.00	0.00	0.00	0.00
Row 9 Customer	0.00	0.00	0.00	0.00	0.00
Row 10 Customer Weighted Services	0.00	0.00	0.00	0.00	0.00
Row 11 Customer Weighted Meters	0.00	0.00	0.00	0.00	0.00
Row 12 Customer Weighted Billing	0.00	0.00	0.00	0.00	0.00
Row 13 Customer Excluding Industrial	0.00	0.00	0.00	0.00	0.00
Row 14 Bad Debt / Collection	0.00	0.00	0.00	0.00	0.00
Row 15 Total	4,185.65	1,572.93	943.44	4.45	1,664.83

Table 7-33: Allocation of Cost of Service Excluding Other Costs (Thousands of Dollars)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Classification	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 Commodity	2,387.67	3,707,818.57	2,252,903.59	0.00	0.00
Row 2 Upstream Capacity	519.44	2,129.16	1,525.79	66.15	0.00
Row 3 Storage Space	84.06	531.91	347.53	23.79	0.00
Row 4 Storage Deliverability	126.08	0.00	0.00	0.00	212,384.83
Row 5 Industrial Direct Assignment	288.18	48,312.20	14,332.14	5,447.63	94,063.38
Row 6 Delivery Commodity	0.00	0.00	0.00	0.00	0.00
Row 7 Capacity HP	0.00	0.00	0.00	0.00	0.00
Row 8 Capacity LP	0.00	0.00	0.00	0.00	0.00
Row 9 Customer	0.00	0.00	0.00	0.00	0.00
Row 10 Customer Weighted Services	0.00	0.00	0.00	0.00	0.00
Row 11 Customer Weighted Meters	0.00	0.00	0.00	0.00	0.00
Row 12 Customer Weighted Billing	0.00	0.00	0.00	0.00	0.00
Row 13 Customer Excluding Industrial	0.00	0.00	0.00	0.00	0.00
Row 14 Bad Debt / Collection	0.00	0.00	0.00	0.00	0.00
Row 15 Total	3,405.43	3,758,791.83	2,269,109.04	5,537.56	306,448.21

Table 7-34: Allocation of Other Costs (Thousands of Dollars unless Otherwise Specified)

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
	Total	Rate 1 - General Firm Service	Rate 6 - Large Volume General Firm Service	Rate 11 - Large Volume Seasonal Service	Rate 16 - Contracted Firm Service
Row 1 New Connections (Connections)	7	7	0	0	0
Row 2 Other Cost per New Connection (\$ / New Connection)		30.00	30.00	30.00	30.00
Row 3 Other Costs	0.21	0.21	0.00	0.00	0.00