

202 S. Main Street Le Sueur, MN 56058 Toll Free: (888) 931-3411 Fax (507) 665-2588 www.greatermngas.com

February 12, 2015

## VIA ELECTRONIC FILING

Mr. Daniel P. Wolf Executive Secretary Minnesota Public Utilities Commission 121 7<sup>th</sup> Place East, Suite 350 St. Paul, Minnesota 55101-2147

RE: Amendment to Petition for Change in Contract Demand Entitlement

Docket No. G022/M-14-651

Dear Mr. Wolf:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Amendment to Petition for Change in Contract Demand Entitlement for 2014-2015 Heating Season for filing in the above-referenced docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/ Kristine A. Anderson Corporate Attorney

Enclosure

cc: Service List

## **CERTIFICATE OF SERVICE**

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

Greater Minnesota Gas, Inc.'s Amendment to Petition for Change in Contract Demand Entitlement for 2014-2015 Heating Season Docket No. G022/M-14-651

filed this 12<sup>th</sup> day of February 12, 2015.

/s/ Kristine A. Anderson Kristine A. Anderson, Esq. Corporate Attorney Greater Minnesota Transmission, LLC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas. com	Greater Minnesota Gas, Inc.	202 S. Main Street  Le Sueur,  MN  56058	Electronic Service	No	OFF_SL_14-651_M-14-651
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-651_M-14-651
Sharon	Ferguson	sharon.ferguson@state.mn .us	n.ferguson@state.mn Department of Commerce		e 500 Electronic Service No		OFF_SL_14-651_M-14-651
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-651_M-14-651
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-651_M-14-651
Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Stree Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-651_M-14-651
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-651_M-14-651
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-651_M-14-651

## STATE OF MINNESOTA

## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair

Nancy LangeCommissionerDan LipschultzCommissionerJohn TumaCommissionerBetsy WerginCommissioner

MPUC Docket No. G022/M-14-651

AMENDMENT TO
PETITION FOR CHANGE IN
CONTRACT DEMAND ENTITLEMENT
FOR 2014-2015 HEATING SEASON

## **OVERVIEW**

Greater Minnesota Gas, Inc. ("GMG") submitted it Petition for Change in Contract Demand Entitlement to the Minnesota Public Utilities Commission ("Commission") on July 31, 2014 to notify the Commission of a minor change in contract demand entitlement effective November 1, 2014. GMG has provisionally included the rate impact of its proposed changes in GMG's Purchased Gas Adjustments effective November 1, 2014, pending Commission approval. The Minnesota Department of Commerce, Division of Energy Resources ("the Department") filed its Comments recommending approval on September 2, 2014. GMG did not make any changes to design day calculations or to its peak day entitlement request in the fall.

GMG submits this Amendment to its Petition to provide information regarding an addition to GMG's transportation contracts and seek approval for cost recovery effective February 1, 2015. GMG will provisionally include the rate impact of the change in GMG's Purchased Gas Adjustments effective March 1, 2015.

### **DISCUSSION**

On January 26, 2014, Viking provided notice that it declared open season for currently available capacity beginning February 1, 2014. Viking opened a three-day bidding window for capacity that became available as the result of Viking's anticipation that PHMSA would lift its then-existing restriction on the Viking line on January 29, 2014. Viking had not previously provided updates regarding its progress with PHMSA. Viking posted Firm capacity under Rate Schedule FT-A; and, the available capacity was 40,121 dekatherms ("Dth") per day. Viking would not accept bids that did not start on February 1, 2015 (or contemporaneously with the lifting of the

GMG Amendment to Contract Demand Entitlement Petition February 12, 2015 Page 2

PHMSA restriction, if later). A copy of Viking's posting notice is appended hereto as Attachment A.

True to the nature of open bidding, it was uncertain whether GMG's bid would be high enough to receive any capacity. Additionally, there was uncertainty as to whether or when PHMSA would lift its restriction. Prior to submitting a bid, GMG did advise Commission staff and Department staff of its intent to submit a bid for 1,200 Dth of capacity, as well as the time constraints imposed by Viking, with the full understanding that neither the Commission staff nor the Department staff were in a position to approve or deny recovery.

GMG moved to protect its customers and submitted its bid. As a result of the open bidding process, GMG contracted for 1,200 dekatherms of Viking forward haul at Emerson with delivery at Randall. GMG was able to secure the contract through January 31, 2026. GMG believes that contracting for firm capacity through Viking's open season made sense for its customers. Because the Viking capacity is existing capacity not requiring new facilities, the cost of the transportation is much more competitive than the cost of transportation on either the Northern Natural or ANR pipelines.

GMG intends to file its next petition regarding a change in its contract demand entitlement by April 1, 2015. Details regarding GMG's customer equivalent projections for the 2015-2016 heating season will be included therewith. Nonetheless, the impact of the additional Viking contract on the last two heating-season months of GMG's current demand entitlement request is shown below:

	Previous Entitlement (Dth)	Proposed Entitlement (Dth)	Entitlement Changes (Dth)	% Change From Previous Year
NovJan.	9,559	9,659	100	1.05%
FebMar.	9,559	10,839	1300	13.60%

The addition of the Viking forward haul firm transportation contract furthers GMG's commitment, and the Commission's commitment, to sufficient assurance of reliability and reasonable rates for customers. GMG's portfolio remains balanced based on an integrated system. An amended Attachment B, appended hereto, reflects that filed with GMG's initial demand entitlement petition, along with the current change and the minor change to GMG's TFX supply for the month of October, 2014 that was previously identified. Similarly, the appended amended Attachment C identifies GMG's contracts and the corresponding change in contract demand costs. Attachment D includes selected portions of the PGA actually filed by GMG in February, 2015 and an alternate illustrative of the same portions showing the impact of the additional Viking contract.

GMG Amendment to Contract Demand Entitlement Petition February 12, 2015 Page 3

GMG is confident that the minimal rate impact on its customers is outweighed by the security provided by the contract addition. The protection offered by guaranteed availability at a low cost supports GMGs decision and supports approval of GMG's demand entitlement request.

## REQUEST FOR COMMISSION ACTION

GMG believes that its proposed change in contract demand entitlement continues to serve best interests of its customers. GMG's coordination of its gas-supply planning for the 2014-1015 heating season a beyond coupled with consideration of previous Department and Commission concerns and recommendations and its broader corporate planning presents the best situation currently available. It balances assurance of physical reliability with sufficient supply to serve all customers for the long term in the event that design day weather occurs against minimizing the rate impact to GMG's customer of maintaining a sufficient reserve. Therefore, GMG respectfully requests that the Commission approve its Petition for Change in Contract Demand Entitlement for 2014-2015 Heating Season, as amended.

Dated: February 12, 2015 Respectfully submitted,

/s/

Kristine A. Anderson Corporate Attorney Greater Minnesota Gas, Inc. 202 S. Main Street Le Sueur, MN 56068 Phone: 888-931-3411 From: vgtemailprod@oneok.com [mailto:vgtemailprod@oneok.com]

Sent: Monday, January 26, 2015 4:04 PM

To: Greg Palmer

Subject: Non-Critical, TSP Cap Offer, 2015/01/26, VGT, 609166673

Title: Open Season currently available capacity begining February 1, 2015

Notice Status: Initiate

Notice Effective Date/Time: 26-JAN-15 Notice End Date/Time: 28-FEB-15

Critical Notice: No

Notice Type: TSP Cap Offer

Notice Text: Viking Gas Transmission Company, L.L.C. (Viking) is posting Firm capacity under Rate Schedule FT-A. This is currently available capacity not subject to a Right of First Refusal which was previously restricted by the reduction in the Maximum Allowable Operating Pressure (MAOP) directed by the Pipeline and Hazardous Materials Safety Administration (PHMSA). Viking anticipates the PHMSA MAOP restriction to be removed and operational adjustments completed to allow for the return to service of the capacity noted below by 9:00 a.m. CCT, Thursday, January 29, 2015. The availability of the capacity for Firm Schedule FT-A service subscription pursuant to this open season is contingent on the PHMSA MAOP restriction being lifted as anticipated and the completion of required operational adjustments to execute returning to 877 MAOP.

Rate Schedule: FT-A

Available Maximum Daily Quantity: 40,121 Dth/d

Term: Beginning February 1, 2015

Primary Rec. Point: Any Primary Del. Point: Any

Reservation Rate: Rates up to maximum, pursuant to Rate Schedule FT-A of Viking's tariff.

The available capacity described above will be subject to an open bidding process. Bids for the Firm capacity described above will be accepted beginning 9:00 a.m. CCT, Tuesday, January 27, 2015 and ending at 5:00 p.m. CCT, Thursday, January 29, 2015. Bids for this capacity will be accepted via email to a Commercial representatives listed below.

Viking will award capacity based on Net Present Value (NPV) calculation pursuant to Viking's FERC Gas Tariff General Terms & Conditions subsection 22.7. In the event equal NPV bids are received, Viking will allocate capacity on a pro-rata basis. A Shipper must indicate in its bid whether it is willing to accept a lesser quantity in the event such capacity is awarded on apro-rata basis due to equal bids.

Although Viking does not anticipate a change in timing for the subject service availability, shippers submitting a bid for capacity acknowledge that the start date of service may be delayed in the event the anticipated removal of the PHMSA MAOP restriction and operational adjustments are delayed beyond 9:00 a.m. CCT February 1, 2015. Shippers submitting a bid agree to a start date as of the date the capacity becomes available if such date is delayed beyond 9:00 a.m. CCT February 1, 2015.

Questions concerning this posting may be directed to the following Viking representatives:

Kyle Keener: (918) 591-5074 or <u>Kyle.Keener@oneok.com</u> Kurt Wood: (918) 591-5077 or <u>Kurtis.Wood@oneok.com</u> Glen Richars: (918) 591-5171 or Glen.Richars@oneok.com

# Greater Minnesota Gas, Inc. Contract Demand Entitlement Filing Demand Profile

2012 - 2013 Heating Season	Quantity
	(Dth)
TF-7 (Summer - Apr Oct.)	300
TF 12 (Nov Oct.)	210
TFX-7 (Oct Apr.))	665
TFX-5 (Nov Mar.)	4,244
Viking Zone 1	
TFX-5 (Nov Mar.)	90
Delivery Contract	
Capacity Release - Non-recallable	-
SMS	1,300
Heating Season Total Capacity	5,209
Non-Heating Season Total Capacity	510
Total Entitlement @ Peak	5,209
Total Annual Transportation	-
Total Season Transportation	5,209
Total Percent Summer Vs. Winter	9.8%
Total Percent Seasonal	100.0%

1		
	2013 - 2014 Heating Season (revised)	Quantity
		(Dth)
	TF-7 (Summer - Apr Oct.)	-
	TF 12 (Nov Oct.)	210
	TFX-7 (Oct Apr.))	665
(7)	TFX-5 (Nov Mar.)	6,344
	Viking Zone 1	2,000
	TFX-5 (Nov Mar.)	90
	Viking Forward Haul/Emerson	1,300
	Delivery Contract	950
	Capacity Release - Non-recallable	-
	SMS	1,300
		·
(7)	Heating Season Total Capacity	9,559
	Non-Heating Season Total Capacity	210
	Total Entitlement @ Peak	9,559
	Total Annual Transportation	-
	Total Season Transportation	9,559
	Total Percent Summer Vs. Winter	2.2%
	Total Percent Seasonal	100.0%
		. 50.070

		-	
	2014 - 2015 Heating Season	Quantity	FebMar. Change
		(Dth)	in Quantity (Dth)
	TF-7 (Summer - Apr Oct.)	-	-
	TF 12 (Nov Oct.)	210	-
	TFX-7 (Oct Apr.))	665	-
	TFX-5 (Nov Mar.)	6,344	-
(2)	Viking Zone 1	2,000	-
	TFX-5 (Nov Mar.)	90	-
(3)	Viking Forward Haul/Emerson	1,400	
(4)	Delivery Contract	950	-
(5)	TFX-1 (Purchased Oct. 2014)	1,000	
(6)	Viking Forward Haul/Emerson (Feb Nov.)	1,200	1,200
	SMS	2,000	700
	Heating Season Total Capacity-Feb & March	10,859	1,200
	Non-Heating Season Total Capacity	210	-
	Total Entitlement @ Peak	10,859	1,200
	Total Annual Transportation	-	-
	Total Season Transportation	10,859	1,200
	Total Percent Summer Vs. Winter	1.9%	
	Total Percent Seasonal	100.0%	

### Notes:

- 2/ Transport only. Does not increase peak day entitlement.
- 3/1,400 Dth disrupted in October, 2014 only due to Viking force majeur.
- 4/ Company has contract for supply delivered to TBS. No demand charges are applicable, but the 950 dekatherms is available on peak day.
- 5/1,000 Dth of TFX purchased for month of October, 2014 only to replace capacity loss to Viking's force majeur. Does not affect peak day entitlement.

## 6/ 1,200 Dth of FT-A purchased during Viking open season beginning February 1, 2015.

7/ GMG identified a typographical error in the prior version. It has been corrected on this copy.

<sup>1/</sup> Only items in bold affect capacity entitlement level.

21.1%

Greater Minnesota Gas, Inc.
Northern Natural Gas Contract Summary
Contract Entitlement Changes as of November 1, 2014
Contract Entitlements 2013-14

Contract No.	Service Type	Rate Schedule	Months	Entitlement (Dth)	Expiration Date
102985	Firm Throughput	TFX - 5	Nov-Mar	3,000	3/31/2017
102985	Firm Throughput	TFX - 5	Nov-Mar	500	3/31/2018
102985	Firm Throughput	TFX - 5	Nov-Mar	500	3/31/2014
102985	Firm Throughput	TFX - 5	Nov-Mar	2,100	3/31/2014
102985	Firm Throughput	TF - 12	Nov-Mar	244	3/31/2015
121534	Firm Throughput	TFX - 7	Oct-Apr	665	10/31/2015
120579	Firm Throughput	TF - 12	Oct-Sep	181	9/30/2017
120579	Firm Throughput	TF - 12	Oct-Sep	29	9/30/2017
120579	Firm Throughput	TF - 5	Nov-Mar	90	9/30/2017
127955	Firm Throughput	TF - 11	Oct 2014 only		
BP Contract	Contracted Delivery		Nov-Sep	950	4/30/2015
Viking Emerson	Forward Haul	TF-5	Dec-Mar	1,300	3/31/2014
		2013-14 Heating Se	eason Total Capacity	9,559	
		2013-14 Design Da	y Demand	8,065	
		Reserve Margin		1,494	18.5%

## **Proposed Contract Entitlement Changes for 2014-15**

Start Date	Contract No.	Service Type	Rate Schedule	Months	Entitlement (Dth)	Expiration Date
	Viking Emerson	Forward Haul	TF-5	Dec-Mar	(1,300)	3/31/2014
	Viking Emerson	Forward Haul	TF-5	Nov-Oct	1,400	10/31/2018
	Viking Emerson	Forward Haul	FT-A	Feb-Oct	1,200	1/31/2026
			2044 45 Heating Co	anna Tatal Canasitu	40.050	

2014-15 Heating Season Total Capacity	10,859
2014-15 Design Day Demand	8,969
R <mark>eserve Margin</mark>	1,890

## **Proposed Change in Contract Demand Costs**

Contract No.	Rate Schedule	Volume Dth / Day	No. of Months	Mont Dem	thly and Rates	Total Annual Cost		
Viking Emerson	TF-5	(1,300)	4	\$	3.7671	\$ (19,588.92)		
Viking Emerson	TF-5	1,400	12	\$	4.3706	\$ 73,426.08		
Viking Emerson	FT-A	1,200	9	\$	4.3706	\$ 47,202.48		
						\$ 101,039.64		

# Greater Minnesota Gas, Inc. Purchased Gas Adjustment (PGA) Calculation

#### IV. Greater Minnesota Gas, Inc.'s -- Current Cost of Gas Effective

#### February 1, 2015

, , , , , , , , , , , , , , , , , , , ,				,			Rate/CCF	
All Customer Sales Rate Classes		MCF	x Months	x Tariff Rate	Equals	Firm	Ag Interr	Gen Interr
	Viking Zone 1	2,000	12	\$4.3706	104,894	\$0.011119		
	Viking Zone 1	1,400	12	\$4.3706	73,426	\$0.007783		
	TFX - 5	6,344	5	\$15.1530	480,653	\$0.050950		
	TF - 12	181	5	\$10.2300	9,258	\$0.000981		
	TF - 12	181	7	\$5.6830	7,200	\$0.000763		
	TF - 12	29	5	\$10.2300	1,483	\$0.000157		
	TF - 12	29	7	\$5.6830	1,154	\$0.000122		
	TF - 5	90	5	\$15.1530	6,819	\$0.000723		
	TFX - 7	665	5	\$15.1530	50,384	\$0.005341		
	TFX - 7	665	2	\$5.6830	7,558	\$0.000801		
	TFX	1,000	1	\$5.6830	5,683	\$0.000602		
					0	\$0.000000		
	Current Demand C	ost of Gas			\$748,513	\$0.079342	\$0.000000	\$0.000000
	Current Commodity	Cost of Gas/CCF		% of Total 83%	\$3,620,231	\$0.337590	\$0.337590	\$0.337590
	Total Cost of Gas/0	CCF			\$4,368,744	\$0.416932	\$0.337590	\$0.337590

#### Summary of Cost All Customer Sales Rate Classes (/CCF)

1) Base Rate
2) Prior PGA
<ol><li>Current Adj</li></ol>
4) PGA Billed (2+3)
5) Average Cost of Gas

Firm Sales				Agricultural Interruptible			General Interruptible				
Total	Total			Total	Total			Total	Total		
Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total
\$0.082929	\$0.588013	\$0.000000	\$0.670942	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013
(\$0.007794)	(\$0.209883)	\$0.003640	(\$0.214037)	\$0.000000	(\$0.209883)	(\$0.009730)	(\$0.219613)	\$0.000000	(\$0.209883)	(\$0.003190)	(\$0.213073)
\$0.004207	(\$0.040540)	\$0.000000	(\$0.036333)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)
(\$0.003587)	(\$0.250423)	\$0.003640	(\$0.250370)	\$0.000000	(\$0.250423)	(\$0.009730)	(\$0.260153)	\$0.000000	(\$0.250423)	(\$0.003190)	(\$0.253613)
\$0.079342	\$0.337590	\$0.003640	\$0.420572	\$0.000000	\$0.337590	(\$0.009730)	\$0.327860	\$0.000000	\$0.337590	(\$0.003190)	\$0.334400

	Prior Cumulative Adjustments	Demand & Commodity Change Filed Herein	True-up Adjustment Factor Change Eff. September 1, 2014 (G022/AA-14)	Current PGA Adjustment
All Firm Sales Rate Classes (/CCF)	(\$0.217677)	(\$0.036333)	\$0.003640	(\$0.250370)
Ag Inter. Sales Rate Classes (/CCF)	(\$0.209883)	(\$0.040540)	(\$0.009730)	(\$0.260153)
Gen. Inter. Sales Rate Classes (/CCF)	(\$0.209883)	(\$0.040540)	(\$0.003190)	(\$0.253613)

Rate/CCF

#### Greater Minnesota Gas, Inc. Purchased Gas Adjustment (PGA) Calculation

#### IV. Greater Minnesota Gas, Inc.'s -- Current Cost of Gas Effective

#### February 1, 2015

All Customer	Sales	Rate	Classes
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	MCF	x Months	x Tariff Rate	Equals	Firm	Ag Interr	Gen Interr
Viking Zone 1	2,000	12	\$4.3706	104,894	\$0.011119		
Viking Zone 1	1,400	12	\$4.3706	73,426	\$0.007783		
Viking Zone 1	1,200	9	\$4.3706	47,202	\$0.005003		
TFX - 5	6,344	5	\$15.1530	480,653	\$0.050950		
TF - 12	181	5	\$10.2300	9,258	\$0.000981		
TF - 12	181	7	\$5.6830	7,200	\$0.000763		
TF - 12	29	5	\$10.2300	1,483	\$0.000157		
TF - 12	29	7	\$5.6830	1,154	\$0.000122		
TF - 5	90	5	\$15.1530	6,819	\$0.000723		
TFX - 7	665	5	\$15.1530	50,384	\$0.005341		
TFX - 7	665	2	\$5.6830	7,558	\$0.000801		
TFX	1,000	1	\$5.6830	5,683	\$0.000602		
				0	\$0.000000		
Current Demand Co	ost of Gas			\$795,716	\$0.084345	\$0.000000	\$0.000000
Current Commodity Cost of Gas/CCF % of T			% of Total 82%	\$3,620,231	\$0.337590	\$0.337590	\$0.337590
Total Cost of Gas/CCF				\$4,415,946	\$0.421935	\$0.337590	\$0.337590

#### Summary of Cost All Customer Sales Rate Classes (/CCF)

1) Base Rate 2) Prior PGA

3) Current Adj 4) PGA Billed (2+3)

5) Average Cost of Gas

All Firm Sales Rate Classes (/CCF) Ag Inter. Sales Rate Classes (/CCF) Gen. Inter. Sales Rate Classes (/CCF)

	Firm Sales			Agricultural Interruptible			General Interruptible					
	Total	Total			Total	Total			Total	Total		
	Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total
	\$0.082929	\$0.588013	\$0.000000	\$0.670942	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013
	(\$0.007794)	(\$0.209883)	\$0.003640	(\$0.214037)	\$0.000000	(\$0.209883)	(\$0.009730)	(\$0.219613)	\$0.000000	(\$0.209883)	(\$0.003190)	(\$0.213073)
	\$0.009210	(\$0.040540)	\$0.000000	(\$0.031330)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)	\$0.000000	(\$0.040540)
	\$0.001416	(\$0.250423)	\$0.003640	(\$0.245367)	\$0.000000	(\$0.250423)	(\$0.009730)	(\$0.260153)	\$0.000000	(\$0.250423)	(\$0.003190)	(\$0.253613)
T	\$0.084345	\$0.337590	\$0.003640	\$0.425575	\$0.000000	\$0.337590	(\$0.009730)	\$0.327860	\$0.000000	\$0.337590	(\$0.003190)	\$0.334400

Prior Cumulative Adjustments	Commodity Change Filed Herein	Factor Change Eff. September 1, 2014 (G022/AA-14)	Current PGA Adjustment		
(\$0.217677)	(\$0.031330)	\$0.003640	(\$0.245367)		
(\$0.209883)	(\$0.040540)	(\$0.009730)	(\$0.260153)		
(\$0.209883)	(\$0.040540)	(\$0.003190)	(\$0.253613)		

True-up Adjustment

Demand &