



August 12, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Docket # P-2021-3025909

Dear Secretary Chiavetta:

Enclosed please find one (1) copy of National Fuel Gas Distribution Corporation's response to the following Bureau of Technical Utility Services – Petition of National Fuel Gas Distribution Corporation data request:

TUS-1

TUS-2

TUS-3

No Confidential Company Information is in the responses.

Yours truly,

Donald Koch

Donald Koch
Rate Analyst III

Copy via email: Marc Hoffer, Bureau of Technical Utility Services

VERIFICATION

I, Donald Koch, being a Rate Analyst III in the Rates and Regulatory Affairs Department at National Fuel Gas Distribution Corporation, hereby state that the information set forth in the foregoing Petition is true and correct to the best of my knowledge, information, and belief and that I expect National Fuel Gas Distribution Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: August 12, 2021

Donald Koch

Donald Koch
National Fuel Gas Distribution Corporation

Docket No. P-2021-3025909
National Fuel Gas Distribution Corporation Petition
Data Request

TUS -1. Appendix D of the Petition indicates that the Amortization of Unprotected Excess Deferred Taxes totals \$1,032,645. However, in the TCJA Reconciliation Filing for the 3 months ended 9/30/18 (Docket No. M-2019-3007596) Amortization of Unprotected Excess Deferred Taxes totaled \$957,600. Explain why these amounts are different and whether the amount proposed in this Petition is appropriate.

Response:

The initial TCJA Reconciliation Filing for the 3 months ended 9/30/18 (Docket No. M-2019/3007596), which was filed January 28, 2019, included an estimate of the Amortization of Unprotected Deficient Deferred Taxes totaling \$957,600. This estimate was finalized after the Company filed the fiscal year 2018 federal tax return in June 2019. The Amortization of Unprotected Deficient Deferred Taxes total of \$1,032,645, included on Appendix D of the Petition, is based on actuals per the tax return. The Annual TCJA Compliance Filing made August 29, 2019 included the updated Amortization of Unprotected Deficient Deferred Taxes, as noted in the filing.

Docket No. P-2021-3025909
National Fuel Gas Distribution Corporation Petition
Data Request

TUS -2. Provide actual monthly revenues for fiscal year 2018 to provide a basis for the allocation of revenue requirement of the Petition.

Response:

Please see allocation below:

| Total Billed Revenues by Month | | |
|---------------------------------------|-----------------------|-------------------|
| For TME 9/30/2018 | | |
| Month | Total | % of Total |
| October | \$ 7,659,977 | 3.54% |
| November | \$ 15,037,997 | 6.94% |
| December | \$ 26,004,061 | 12.01% |
| January 2018 | \$ 38,091,562 | 17.59% |
| February | \$ 32,420,141 | 14.97% |
| March | \$ 27,394,804 | 12.65% |
| April | \$ 27,102,596 | 12.52% |
| May | \$ 15,797,962 | 7.30% |
| June | \$ 7,879,245 | 3.64% |
| July | \$ 6,498,060 | 3.00% |
| August | \$ 6,268,801 | 2.90% |
| September | \$ 6,413,558 | 2.96% |
| Total TME 9/30/18 | \$ 216,568,762 | 100.00% |

Docket No. P-2021-3025909
National Fuel Gas Distribution Corporation Petition
Data Request

TUS -3. Provide an interest calculation utilizing the same methodology as NFG used in the TCJA Reconciliation Filing at Docket No. M-2021-3023945.

Response:

Please see calculation below:

| NFG | | | | | | | |
|----------|----------------|----------------|--------------|-------------------|---------|-----------------|-----------------|
| | 1 | 2 | 3 | 4=1+2+3 | 5 | 6 | 7=4*(5*6) |
| Month | RR | ARAM | Unprotected | Tax savings | Ann Int | Interest Weight | Interest |
| Oct - 17 | (\$130,370.47) | (\$101,043.47) | \$126,606.61 | (\$104,807.33) | 5.00% | 54 / 12 | \$ (23,581.65) |
| Nov | (\$255,949.27) | (\$101,043.47) | \$126,606.61 | (\$230,386.13) | 5.00% | 53 / 12 | \$ (50,876.94) |
| Dec | (\$442,566.66) | (\$101,043.47) | \$126,606.61 | (\$417,003.52) | 5.25% | 52 / 12 | \$ (94,868.30) |
| Jan - 18 | (\$648,313.90) | (\$101,043.47) | \$126,606.61 | (\$622,750.76) | 5.00% | 51 / 12 | \$ (132,334.54) |
| Feb | (\$551,780.04) | (\$101,043.47) | \$126,606.61 | (\$526,216.90) | 5.00% | 50 / 12 | \$ (109,628.52) |
| Mar | (\$466,230.17) | (\$101,043.47) | \$126,606.61 | (\$440,667.03) | 5.25% | 49 / 12 | \$ (94,467.99) |
| Apr | (\$461,291.06) | (\$101,043.47) | \$126,606.61 | (\$435,727.92) | 5.50% | 48 / 12 | \$ (95,860.14) |
| May | (\$268,886.80) | (\$101,043.47) | \$126,606.61 | (\$243,323.66) | 5.50% | 47 / 12 | \$ (52,415.97) |
| Jun | (\$134,093.24) | (\$101,043.47) | \$126,606.61 | (\$108,530.10) | 5.50% | 46 / 12 | \$ (22,881.76) |
| | | | | | | | |
| Total | \$ (3,359,482) | \$ (909,391) | \$ 1,139,459 | \$ (3,129,413.35) | | | \$ (676,915.82) |